

**EPA Registration File No. 84229-16**  
**PART 2**

PYXIS REGULATORY CONSULTING, INC.

4110 136<sup>th</sup> St. NW  
Gig Harbor, WA 98332

Phone: 253-853-7369  
Fax: 253-853-5516  
Nicole@PyxisRC.com

July 30, 2015

COURIER DELIVERY

Venus Eagle (PM 1)  
Document Processing Desk (FNL LBL)  
Office of Pesticide Programs (7504P)  
U.S. Environmental Protection Agency  
Room S-4900, One Potomac Yard  
2777 S. Crystal Drive  
Arlington, VA 22202

RE: Tide International, USA, Inc. – Tide Technical Imidacloprid (EPA Reg. No. 84229-16)  
Submission of Final Product Labeling per the Agency Letter dated May 4, 2015

Dear Ms. Eagle,

On behalf of Tide International, USA, Inc. and in response to the Agency letter dated May 4, 2015 please find enclosed the final product labeling for Tide Technical Imidacloprid (EPA Reg. No. 84229-16).

In support of this submission, we submit the following documents:

1. Completed Application for Registration (EPA Form 8570-1)
2. One (1) copy of the Tide Technical Imidacloprid final product labeling
3. Letter of Authorization

Please feel free to contact me by phone (253) 853-7369 or by email at Nicole@PyxisRC.com if you have any questions or need any additional information.

Sincerely,



Nicole Cochran

Enclosures

cc: A. Van Wagner; Tide International, USA, Inc.





United States  
Environmental Protection Agency  
Washington, DC 20460

☐ Registration  
☐ Amendment  
☒ Other

OPP Identifier Number

## Application for Pesticide - Section I

1. Company/Product Number 84229-16	2. EPA Product Manager V. Eagle	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Tide International, USA, Inc. / Tide Technical Imidacloprid	PM# 1	
5. Name and Address of Applicant (Include ZIP Code) Tide International, USA, Inc. c/o Pyxis Regulatory Consulting, Inc. 4110 136th St. NW Gig Harbor, WA 98332 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: <b>NOT REVIEWED</b> EPA Reg. No. _____ In Accordance with PR Notice 8-2 Product Name _____ Based on Draft Labeling Dated _____	

## Section - II

5/4/2015

<input type="checkbox"/> Amendment - Explain below.	<input checked="" type="checkbox"/> Final printed labels in response to Agency letter dated 5/4/15
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Submission of the final printed label per the Agency letter dated May 4, 2015.

## Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		<input type="checkbox"/> Metal	lined fiber drum or plastic bags
				<input type="checkbox"/> Plastic	
				<input type="checkbox"/> Glass	
* Certification must be submitted				<input type="checkbox"/> Paper	
	If "Yes" Unit Packaging wgt.	No. per container	If "Yes" Package wgt	No. per container	<input checked="" type="checkbox"/> Other (Specify) _____
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container 25 kg (55.12 lb), 50 kg (110.23 lb)		5. Location of Label Directions <input checked="" type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product	
6. Manner in Which Label is Affixed to Product <input checked="" type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled			<input type="checkbox"/> Other _____		

## Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)			
Name Nicole Cochran	Title Agent	Telephone No (Include Area Code) (253) 853-7309	
<b>Certification</b> I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.			6. Date Application Received  (Stamped)
2. Signature 	3. Title Agent		
4. Typed Name Nicole Cochran	5. Date July 30, 2015		



## TIDE TECHNICAL IMIDACLOPRID

FOR MANUFACTURING USE ONLY

**ACTIVE INGREDIENT:**

Imidacloprid, 1-[(6-chloro-3-pyridinyl)methyl]-N-nitro-2-imidazolidinimine.....99.0%

**OTHER INGREDIENTS:**.....1.0%

**TOTAL:**.....100.0%

### KEEP OUT OF REACH OF CHILDREN CAUTION

**FIRST AID**

If

swallowed:

- Call a poison control center or doctor immediately for treatment advice.
- Have person sip a glass of water if able to swallow.
- Do not induce vomiting unless told to do so by the poison control center or doctor.
- Do not give anything by mouth to an unconscious person.

**NOTE TO PHYSICIAN**

No specific antidote is available. Treat symptomatically.

**HOT LINE NUMBER**

Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact CHEMTREC at 1-800-424-9300 for emergency medical treatment information.

EPA Reg. No.: 84229-16  
Batch No.: See container

EPA Est. No.: ☐ 84153-CHN-001  
☐ 87410-CHN-001  
☐ 83158-CHN-001  
☐ 70905-IND-1

Net Weight: ☐ 55.12 lbs/Drum (25 kg/Drum)  
☐ 110.23 lbs/Drum (50 kg/Drum)

Manufactured in China  
Manufactured for:  
Tide International USA, Inc.  
21 Hubble, Irvine, CA 92618

INSECTICIDE

PEEL BACK BOOK HERE AND RESEAL AFTER OPENING



**PRECAUTIONARY STATEMENTS  
HAZARDS TO HUMANS AND DOMESTIC ANIMALS**

**CAUTION**

Harmful if swallowed. Wash thoroughly with soap and water after handling and before eating, drinking, or using tobacco. Wear long-sleeved shirt and long pants, socks, shoes and chemical resistant gloves made of any waterproof material such as barrier laminate, butyl rubber, nitrile rubber, neoprene rubber, natural rubber, polyethylene, polyvinylchloride (PVC) or viton.

**ENVIRONMENTAL HAZARDS**

This product is highly toxic to aquatic invertebrates. Keep out of lakes, streams, or ponds. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans, or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the EPA.

**DIRECTIONS FOR USE**

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. This product is to be used only for formulation into registered insecticide products and is not for resale under this label.

**Instructions to Formulators:** This technical product may be used to manufacture insecticide end-use products for:

- 1) Terrestrial Non-Food Crop, Residential, and Commercial Outdoor (including Greenhouses): lawn, turf and ornamentals (trees, shrubs, evergreens, flowers, foliage plants, groundcovers) in and around residential or commercial buildings; Christmas trees; Poplar/Cottonwood trees.
- 2) Residential and Commercial Indoor Non-Food: Greenhouse ornamentals; interior plantscapes.
- 3) Indoor Non-food Use: Tide Technical Imidacloprid can be formulated into end-use aqueous and solvent system products for pressure treatment of wood products [millwork (window frames, wood doors, doorframes, etc.), in-ground contact uses (wood products – pilings, telephone poles, wood building materials, etc.); sapstain control (fresh-cut lumber)] to protect against termites.
- 4) Terrestrial Food Crops:

Artichoke (Globe)  
Banana & Plantain  
Bushberry Crop Subgroup  
*Brassica* (Cole) Crop Group  
Bulb Vegetables Crop Group  
Caneberry  
Canola  
Cereal Grain Crop Group (barley, oat, rye, sorghum, wheat),  
excluding rice  
Citrus Crop Group (containerized and field)  
Coffee  
  
Cotton

Herb Crop Subgroup 19A  
Hops  
Leafy Petiole Vegetables Crop Subgroup  
Leafy Vegetables Crop Subgroup  
Legume Vegetables Crop Group, except soybean  
Peanuts  
Pome Fruit Crop Group  
Pomegranate  
  
Potato (including seed piece treatment)  
Root and Tuber Vegetables Crop Subgroup, except  
sugar beet  
Soybean

Cranberry  
Cucurbit Crop Group  
Fruiting Vegetable Crop Group  
Grapes  
Greenhouse Vegetables (tomato, cucumber)

Strawberry  
Stone Fruit Crop Group  
Sugar Beet  
Tobacco  
Tree Nut Crop Group, excluding Almonds  
Tropical Fruit (Acerola, Atemoya, Avocado, Black sapote, Canistel, Cherimoya, Custard apple, Feijoa, Jaboticaba, Guava, Llama, Longan, Lychee, Mamey sapote, Mango, Papaya, Passionfruit, Persimmon, Pulasan, Rambutan, Sapodilla, Soursop, Spanish lime, Star apple, Starfruit, Sugar apple, Wax jambu)

- 5) Uses for which U. S. EPA has accepted the required data and/or citation of data that the formulator has submitted in support of registration;
- 6) Uses for experimental purposes that are in compliance with U.S. EPA requirements

## STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

**PESTICIDE STORAGE:** Store in a cool, dry place away from food, drink and animal feeding stuffs. If spilled, do not flush to waterways (see Environmental Hazards). Carefully collect and containerize spilled material in a manner that produces the least amount of airborne dust. Suitable protective equipment should be worn during any spill cleanup operation (see Precautionary Statements). Residual surface material may be removed with towels moistened with methanol.

**PESTICIDE DISPOSAL:** Pesticide wastes are acutely hazardous. Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

### CONTAINER HANDLING:

**Lined Drums: Liner:** Nonrefillable container. Do not reuse or refill this container. Completely empty liner into application equipment by shaking and tapping sides and bottom to loosen clinging particles. When completely empty offer for recycling if available or dispose of liner in a sanitary landfill.

**Outer Drum:** Nonrefillable container. Do not reuse or refill this container. When completely empty offer for recycling if available or dispose of drum in a sanitary landfill.

**Bags:** Nonrefillable container. Do not reuse or refill this container. Completely empty bag into formulation equipment. Then dispose of empty bag in a sanitary landfill or by incineration, or by other procedures approved by state and local authorities.

## CONDITION OF SALE AND LIMITATION OF WARRANTY AND LIABILITY

**NOTICE:** Read the entire Directions for Use and Conditions of Sale and Limitation of Warranty and Liability before buying or using this product. If the terms are not acceptable, return the product at once, unopened, and the purchase price will be refunded.



The Directions for Use of this product must be followed carefully. It is impossible to eliminate all risks inherently associated with the use of this product. Ineffectiveness or other unintended consequences may result because of such factors as manner of use or application, weather, presence of other materials or other influencing factors in the use of the product, which are beyond the control of Tide International USA, Inc. or Seller. To the extent consistent with applicable law, all such risks shall be assumed by Buyer and User, and Buyer and User agree to hold Tide International USA, Inc. and Seller harmless for any claims relating to such factors.

Tide International USA, Inc. warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated in the Directions for Use, subject to the inherent risks referred to above, when used in accordance with directions under normal use conditions. This warranty does not extend to the use of this product contrary to label instructions, or under abnormal conditions or under conditions not reasonably foreseeable to or beyond the control of Seller or Tide International USA, Inc., and Buyer and User assume the risk of any such use. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, TIDE INTERNATIONAL USA, INC. MAKES NO WARRANTIES OF MERCHANTABILITY OR OF FITNESS FOR A PARTICULAR PURPOSE NOR ANY OTHER EXPRESS OR IMPLIED WARRANTY EXCEPT AS STATED ABOVE.

To the extent consistent with applicable law, neither Tide International USA, Inc. nor Seller shall be liable for any incidental, consequential or special damages resulting from the use or handling of this product. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, THE EXCLUSIVE REMEDY OF THE USER OR BUYER, AND THE EXCLUSIVE LIABILITY OF TIDE INTERNATIONAL USA, INC. AND SELLER FOR ANY AND ALL CLAIMS, LOSSES, INJURIES OR DAMAGES (INCLUDING CLAIMS BASED ON BREACH OF WARRANTY, CONTRACT, NEGLIGENCE, TORT, STRICT LIABILITY OR OTHERWISE) RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT, SHALL BE THE RETURN OF THE PURCHASE PRICE OF THE PRODUCT OR, AT THE ELECTION OF TIDE INTERNATIONAL USA, INC. OR SELLER, THE REPLACEMENT OF THE PRODUCT.

Tide International USA, Inc. and Seller offer this product, and Buyer and User accept it, subject to the foregoing Conditions of Sale and Limitation of Warranty and Liability, which may not be modified except by written agreement signed by a duly authorized representative of Tide International USA, Inc.

EPA Code No.: TIC-INS8422916  
EPA20150416  
Created date: 04/21/2015



Tide International USA Inc.

21 Hubble, Irvine, CA 92618 Phone: 949-679-3535 Fax: 949-679-3538

April 8, 2014

To Whom It May Concern:

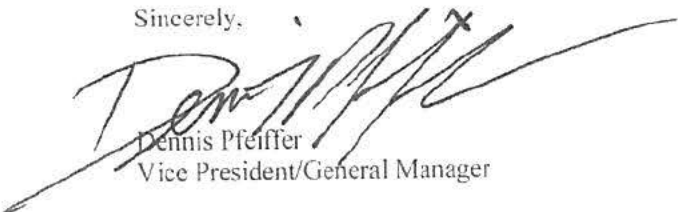
RE: Letter of Authorization

Dear Sir or Madam:

Please let this letter serve to confirm that Janelle Kay, Michael Kellogg, Leanne Pruett, and Ann Tillman of Pyxis Regulatory Consulting, Inc. are authorized to act as agent for Tide International USA, Inc. (EPA Company Number 84229), before the U.S. Environmental Protection Agency, California Department of Pesticide Regulation Pesticide Registration Branch and other state governmental agencies in all matters regarding our pesticide registrations pursuant to the Federal Insecticide, Fungicide and Rodenticide Act ("FIFRA"), 7 U.S.C. § 136 et seq. and state law.

If you have any questions, please do not hesitate to contact me.

Sincerely,

  
Dennis Pfeiffer  
Vice President/General Manager

cc: Pyxis Regulatory Consulting, Inc.

# PROCESSING REQUEST

Reg # 84229-16 Decision # 503683

Description: Revision to Container Handling Language

## Material Available Electronically (see PPLS):

☐ Electronic Label/Letter Dated

☐ Other:

## Material Sent (see jacket):

☐ Stamped Label/Letter Dated

☒ Notification Dated 5/4/2015

☐ New CSF(s) Dated

☐ Other:

File this coversheet and attached materials in the jacket. It must be well organized and clipped together, NOT STAPLED. Then give the jacket with the coversheet and materials to staff in the Information Services Center (ISC) (Room S-4900). If a jacket is full or only available as an image, please file materials in a new jacket and bring it down to the (ISC). For further information please call 703-605-0716.

Reviewer: Melody Banks

Division: 1VB3

Phone: 305 54123

Date: 5/4/2015





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY  
AND POLLUTION PREVENTION

MAY - 4 2015

Ms. Nicole Cochran, Agent  
Tide International, USA, Inc.  
c/o Pyxis Regulatory Consulting, Inc.  
4110 136<sup>th</sup> St. NW  
Gig Harbor, WA 98332

Subject: Label Notification per PRN 2007-4 – Revision to the Container Handling  
Language  
Product Name: Tide Technical Imidacloprid  
EPA Registration Number: 84229-16  
Application Date: April 16, 2015  
Decision Number: 503683

Dear Ms. Cochran:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 2007-4 for the above referenced product. The Registration Division (RD) has conducted a review of this request for its applicability under PRN 2007-4 and finds that the action requested falls within the scope of PRN-2007-4.

The label submitted with the application has been stamped "Notification" and will be placed in our records.

Please be reminded that 40 CFR Part 156.140(a)(4) requires that a batch code, lot number, or other code identifying the batch of the pesticide distributed and sold be placed on non-refillable containers. The code may appear either on the label (and can be added by non-notification via PR Notice 98-10) or durably marked on the container itself.

If you have any questions, please contact Melody Banks at 703 305 5413 or by email at [Banks.Melody@epa.gov](mailto:Banks.Melody@epa.gov).

Sincerely,

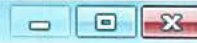
A handwritten signature in cursive script that reads "Melody Banks".

Melody Banks  
Environmental Protection Specialist  
Invertebrate and Vertebrate Branch 3  
Registration Division (7505P)





# Receipt for Section 3



S: 967268

Milestone Email:

Regulatory Type: Product Registration - Section 3

Resubmission: ☐ Yes ☒ No

Print Letter

Application Type: Notification

Fee For Service: ☐ Yes ☒ No

Enter More Information

Company: 84229 TIDE INTERNATIONAL, USA, INC.



Tracking

Risk Manager: Registration Division, Risk Management Team 1

Product #: 84229-16 Product Name: TIDE TECHNICAL IMIDACLOPRID

Override#:

Me Too Section3: 83851-5

Me Too Product Name: TECHNICAL IMIDACLOPRID

Application Date: 16-Apr-2015



OPP Rec'd Date: 20-Apr-2015



Front End Date: 20-Apr-2015



Risk Manager Send Date: 20-Apr-2015



FFS Due Date:

Negotiated Due Date:

OPP Target Date:

Fast Track: ☐

New Ingredient: ☐

Receipt Description:

Label Notification to revise container handling language per PR 2007-4

New Ingredient:

Request Date:

New Ingredient:

Received Date:

Form A: ☐

Signature Date:

Form B: ☐

Signature Date:

Receipt Content	Des
Paper Label	
Electronic Label	
III	

View/Edit

Mileage  
Mileage  
Mileage



United States  
Environmental Protection Agency  
Washington, DC 20460

☐ Registration  
☐ Amendment  
☒ Other

OPP Identifier Number

**Application for Pesticide - Section I**

1. Company/Product Number 84229-16	2. EPA Product Manager V. Eagle	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Tide International, USA, Inc. / Tide Technical Imidacloprid	PM# 1	
5. Name and Address of Applicant (Include ZIP Code) Tide International, USA, Inc. c/o Pyxis Regulatory Consulting, Inc. 4110 136th St. NW Gig Harbor, WA 98332 <input type="checkbox"/> Check if this is a new address	6. <b>Expedited Review.</b> In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

**NOTIFICATION****MAY - 4 2015****Section - II**

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input checked="" type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

**Explanation:** Use additional page(s) if necessary. (For section I and Section II.)

Notification of label change per PR Notice 2007-4. This notification is consistent with the guidance in PR Notice 2007-4 and the requirements of EPA's regulations at 40 CFR 156.10, 156.140, 156.144, 156.146, and 156.156. No other changes have been made to the labeling or the Confidential Statement of Formula for this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if the amended label is not consistent with the requirements of 40 CFR 156.10, 156.140, 156.144, 156.146, and 156.156, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

**Section - III**

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		<input type="checkbox"/> Metal	lined fiber drum or plastic bags
				<input type="checkbox"/> Plastic	
				<input type="checkbox"/> Glass	
				<input type="checkbox"/> Paper	
* Certification must be submitted				<input checked="" type="checkbox"/> Other (Specify) _____	
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container 25 kg (55.12 lb), 50 kg (110.23 lb)		5. Location of Label Directions <input checked="" type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product	
6. Manner in Which Label is Affixed to Product		<input checked="" type="checkbox"/> Lithograph Paper glued Stenciled <input type="checkbox"/> Other _____			

**Section - IV**

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application)		
Name Nicole Cochran	Title Agent	Telephone No. (Include Area Code) (253) 853-7339
<b>Certification</b> I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.		6. Date Application Received (Stamped)
2. Signature 	3. Title Agent	
4. Typed Name Nicole Cochran	5. Date April 16, 2015	

PYXIS REGULATORY CONSULTING, INC.

4110 136<sup>th</sup> St. NW  
Gig Harbor, WA 98332

Phone: 253-853-7369  
Fax: 253-853-5516  
Nicole@PyxisRC.com

April 16, 2015

COURIER DELIVERY

Venus Eagle (PM 1)  
Document Processing Desk (NOTIF)  
Office of Pesticide Programs (7504P)  
U.S. Environmental Protection Agency  
Room S-4900, One Potomac Yard  
2777 S. Crystal Drive  
Arlington, VA 22202-4501

RE: Tide International, USA, Inc. – Tide Technical Imidacloprid (EPA Reg. No. 84229-16)  
Notification of a Revision to the Container Handling Language per PRN 2007-4

Dear Ms. Eagle,

On behalf of Tide International, USA, Inc. please find the enclosed notification of revision to the container handling language per PRN 2007-4 for Tide Technical Imidacloprid (EPA Reg. No. 84229-16). Tide is adding container handling instructions for plastic bags.

In support of this notification submission, we submit the following documents:

1. Completed Application for Registration (EPA Form 8570-1)
2. One (1) copy of the Tide Technical Imidacloprid labeling with changes tracked
3. One (1) copy of the Tide Technical Imidacloprid labeling with changes incorporated
4. Certification with Respect to Label Integrity
5. One (1) copy of the Tide Technical Imidacloprid labeling on CD
6. Letter of Authorization

Please feel free to contact me by phone (253) 853-7369 or by email at Nicole@PyxisRC.com if you have any questions or need any additional information.

Sincerely,



Nicole Cochran

Enclosures

cc: A. Van Wagner, Tide International, USA, Inc.





Tide International USA Inc.

21 Hubble, Irvine, CA 92618 Phone: 949-679-3535 Fax: 949-679-3538

April 8, 2014

To Whom It May Concern:

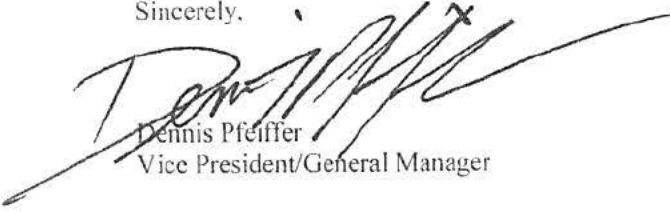
RE: Letter of Authorization

Dear Sir or Madam:

Please let this letter serve to confirm that Janelle Kay, Michael Kellogg, Leanne Pruett, and Ann Tillman of Pyxis Regulatory Consulting, Inc. are authorized to act as agent for Tide International USA, Inc. (EPA Company Number 84229), before the U.S. Environmental Protection Agency, California Department of Pesticide Regulation Pesticide Registration Branch and other state governmental agencies in all matters regarding our pesticide registrations pursuant to the Federal Insecticide, Fungicide and Rodenticide Act ("FIFRA"), 7 U.S.C. § 136 et seq. and state law.

If you have any questions, please do not hesitate to contact me.

Sincerely,

  
Dennis Pfeiffer  
Vice President/General Manager

cc: Pyxis Regulatory Consulting, Inc.

# Certification with Respect to Label Integrity

version: 9/11/02

I certify that the information (including, but not limited to, text, tables, and graphics) contained in the electronic file identified below by file name and submitted with this certification is the same information as that on the paper copies of these documents included with this submission.

PROPOSED LABEL		
EPA Registration #	Date Submitted to EPA	Electronic file name
84229-16	April 16, 2015	84229-16.20150416.Tide Technical Imidacloprid label.pdf

I certify that the statements that I have made on this form are true, accurate, and complete. I acknowledge that any knowingly false or misleading statements may be punishable by fine or imprisonment or both under applicable law.



Signature

April 16, 2015

Date

Nicole Cochran

Name (typed)

Agent

Title

# There is an **ELECTRONIC LABEL** for this action

You can use Acrobat to compare the e-label to the previous version (and find the changes). You can also use Acrobat to mark-up the e-label with your comments.

If e-label was submitted via

**CD-ROM with paper application**

then you will find e-label in

**Electronic Label Library**

*If the e-label is not found in the ELL then it was probably not named correctly and could not be entered into the ELL. However, the file can be retrieved from the CD which is retained by the Front End.*

or

If e-label was submitted via

**XML E-Submission (no paper)**

then you will find e-label in

**Documentum**

See overview of processing e-labels on other side of this sheet.

If you have any questions on e-labels, please contact one of your division e-label experts:

AD	Willie Abney	308-1689
	Renae Whitaker	308-7003
	Tracy Lantz	308-6415
BPPD		
RD	Tom Harris	308-9423

# PROCESSING ELECTRONIC LABELS

(rev. 1/5/09, tch)

If e-label submitted via XML e-submission (not on CD-ROM), you may wish to find e-label in Documentum, save e-label to "My Documents", add e-label to ELL, start below at step 5.

## Initial E-Label per application (on CD-ROM with paper via ITRMD)

<sup>1</sup> ITRMD receives paper submission w/ e-label on CD

<sup>2</sup> Tracking record added to OPPIN

<sup>3</sup> ITRMD adds e-label to ELL

<sup>4</sup> ITRMD sends paper submission to AD/BPPD/RD

<sup>5</sup> Connect ELL record with OPPIN S#

in-process

<sup>6</sup> Save copy of e-label from ELL to My Documents

<sup>7</sup> Review label  
(if acceptable, skip to step 20)

<sup>8</sup> Add comments to e-label  
(save; add "with comments" to filename)

<sup>9</sup> Print annotated e-label  
(use "Print with Filename")

review

<sup>10</sup> Send annotated e-label to registrant via email  
(also send "How To Print")

<sup>11</sup> File print of annotated e-label and email in jacket

<sup>12</sup> Add annotated e-label to ELL

<sup>13</sup> Close submission in OPPIN

out-process

## Resubmission (via email to staffer or PM)

<sup>14</sup> Receive email submission w/ e-label attached

<sup>15</sup> Add tracking record to OPPIN

<sup>16</sup> Add e-label to ELL

<sup>17</sup> Connect ELL record with OPPIN S#

in-process

<sup>18</sup> Save copy of e-labels (old & new) from ELL to My Documents

<sup>19</sup> Compare old and new labels with Acrobat

(if revisions needed repeat steps 8-19)

review

<sup>20</sup> Print e-label, stamp, write cover letter  
(use "Print with Filename")

<sup>21</sup> Mail stamped label & cover letter to registrant

<sup>22</sup> File stamped label & cover letter in jacket

<sup>23</sup> Add cover letter to ELL  
(mandatory if accepted with comments)

<sup>24</sup> Close submission in OPPIN

out-process

### process - big picture

- 1- create OPPIN tracking
- 2- put label in ELL; link to S#
- 3- save ELL label to MyDocuments
- 4- compare / comment
- 5- outprocess

### techniques to know

- filename for e-labels
- "print with filename"
- compare / comment
- printing with comments



**Tide Technical Imidacloprid**  
**FOR MANUFACTURING USE ONLY**

**NOTIFICATION**

**MAY - 4 2015**

**ACTIVE INGREDIENT:**

Imidacloprid,  
1-[(6-chloro-3-pyridinyl)methyl]-*N*-nitro-2-imidazolidinimine.....99.0%

**OTHER INGREDIENTS:** .....1.0%

**TOTAL:**.....100.0%

**KEEP OUT OF REACH OF CHILDREN**  
**CAUTION**

<b>FIRST AID</b>	
<b>If swallowed:</b>	<ul style="list-style-type: none"><li>• Call a poison control center or doctor immediately for treatment advice.</li><li>• Have person sip a glass of water if able to swallow.</li><li>• Do not induce vomiting unless told to do so by the poison control center or doctor.</li><li>• Do not give anything by mouth to an unconscious person.</li></ul>
<b>NOTE TO PHYSICIAN</b>	
No specific antidote is available. Treat symptomatically.	
<b>HOT LINE NUMBER</b>	
Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact CHEMTREC at 1-800-424-9300 for emergency medical treatment information.	

**EPA Reg. No. 84229-16**  
**EPA Est. No.**

**Manufactured for:**  
Tide International USA, Inc.  
21 Hubble  
Irvine, CA 92618

**Net Weight: Lbs.**  
**Batch No.**



**PRECAUTIONARY STATEMENTS**  
**HAZARDS TO HUMANS AND DOMESTIC ANIMALS**  
**CAUTION**

Harmful if swallowed. Wash thoroughly with soap and water after handling and before eating, drinking, or using tobacco. Wear long-sleeved shirt and long pants, socks, shoes and chemical resistant gloves made of any waterproof material such as barrier laminate, butyl rubber, nitrile rubber, neoprene rubber, natural rubber, polyethylene, polyvinylchloride (PVC) or viton.

**ENVIRONMENTAL HAZARDS**

This product is highly toxic to aquatic invertebrates. Keep out of lakes, streams, or ponds. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans, or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the EPA.

**DIRECTIONS FOR USE**

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. This product is to be used only for formulation into registered insecticide products and is not for resale under this label.

**Instructions to Formulators:** This technical product may be used to manufacture insecticide end-use products for:

- 1) Terrestrial Non-Food Crop, Residential, and Commercial Outdoor (including Greenhouses): lawn, turf and ornamentals (trees, shrubs, evergreens, flowers, foliage plants, groundcovers) in and around residential or commercial buildings; Christmas trees; Poplar/Cottonwood trees.
- 2) Residential and Commercial Indoor Non-Food: Greenhouse ornamentals; interior plantscapes.
- 3) Indoor Non-food Use: Tide Technical Imidacloprid can be formulated into end-use aqueous and solvent system products for pressure treatment of wood products [millwork (window frames, wood doors, doorframes, etc.), in-ground contact uses (wood products – pilings, telephone poles, wood building materials, etc.); sapstain control (fresh-cut lumber)] to protect against termites.
- 4) Terrestrial Food Crops:

Artichoke (Globe)	Herb Crop Subgroup 19A
Banana & Plantain	Hops
Bushberry Crop Subgroup	Leafy Petiole Vegetables Crop Subgroup
<i>Brassica</i> (Cole) Crop Group	Leafy Vegetables Crop Subgroup
Bulb Vegetables Crop Group	Legume Vegetables Crop Group, except soybean
Caneberry	Peanuts
Canola	Pome Fruit Crop Group
Cereal Grain Crop Group (barley, oat, rye, sorghum, wheat), excluding rice	Pomegranate
Citrus Crop Group (containerized and field)	Potato (including seed piece treatment)
Coffee	Root and Tuber Vegetables Crop Subgroup, except sugar beet
Cotton	Soybean
Cranberry	Strawberry
Cucurbit Crop Group	Stone Fruit Crop Group
Fruiting Vegetable Crop Group	Sugar Beet

Grapes  
Greenhouse Vegetables (tomato, cucumber)

Tobacco  
Tree Nut Crop Group, excluding Almonds  
Tropical Fruit (Acerola, Atemoya, Avocado, Black sapote, Canistel, Cherimoya, Custard apple, Feijoa, Jaboticaba, Guava, Llama, Longan, Lychee, Mamey sapote, Mango, Papaya, Passionfruit, Persimmon, Pulasan, Rambutan, Sapodilla, Soursop, Spanish lime, Star apple, Starfruit, Sugar apple, Wax jambu)

- 5) Uses for which U. S. EPA has accepted the required data and/or citation of data that the formulator has submitted in support of registration;
- 6) Uses for experimental purposes that are in compliance with U.S. EPA requirements

### STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

**PESTICIDE STORAGE:** Store in a cool, dry place away from food, drink and animal feeding stuffs. If spilled, do not flush to waterways (see Environmental Hazards). Carefully collect and containerize spilled material in a manner that produces the least amount of airborne dust. Suitable protective equipment should be worn during any spill cleanup operation (see Precautionary Statements). Residual surface material may be removed with towels moistened with methanol.

**PESTICIDE DISPOSAL:** **Pesticide wastes are acutely hazardous.** Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

#### CONTAINER HANDLING:

**Liner/Lined Drums: Liner:** Nonrefillable container. Do not reuse or refill this container. Completely empty liner into application equipment by shaking and tapping sides and bottom to loosen clinging particles. When completely empty offer for recycling if available or dispose of liner in a sanitary landfill.

**Outer Drum:** Nonrefillable container. Do not reuse or refill this container. When completely empty offer for recycling if available or dispose of drum in a sanitary landfill.

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Tide International USA, Inc. warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated in the Directions for Use, subject to the inherent risks referred to above, when used in accordance with directions under normal use conditions. This warranty does not extend to the use of this product contrary to label instructions, or under abnormal conditions or under conditions not reasonably foreseeable to or beyond the control of Seller or Tide International USA, Inc., and Buyer and User assume the risk of any such use. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, TIDE INTERNATIONAL USA, INC.



MAKES NO WARRANTIES OF MERCHANTABILITY OR OF FITNESS FOR A PARTICULAR PURPOSE NOR ANY OTHER EXPRESS OR IMPLIED WARRANTY EXCEPT AS STATED ABOVE.

To the extent consistent with applicable law, neither Tide International USA, Inc. nor Seller shall be liable for any incidental, consequential or special damages resulting from the use or handling of this product. **TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, THE EXCLUSIVE REMEDY OF THE USER OR BUYER, AND THE EXCLUSIVE LIABILITY OF TIDE INTERNATIONAL USA, INC. AND SELLER FOR ANY AND ALL CLAIMS, LOSSES, INJURIES OR DAMAGES (INCLUDING CLAIMS BASED ON BREACH OF WARRANTY, CONTRACT, NEGLIGENCE, TORT, STRICT LIABILITY OR OTHERWISE) RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT, SHALL BE THE RETURN OF THE PURCHASE PRICE OF THE PRODUCT OR, AT THE ELECTION OF TIDE INTERNATIONAL USA, INC. OR SELLER, THE REPLACEMENT OF THE PRODUCT.**

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| ~~[20140422]~~[EPA 20150416]

# Tide Technical Imidacloprid

## FOR MANUFACTURING USE ONLY

**ACTIVE INGREDIENT:**

Imidacloprid,  
1-[(6-chloro-3-pyridinyl)methyl]-*N*-nitro-2-imidazolidinimine.....99.0%

**OTHER INGREDIENTS:** .....1.0%

**TOTAL:** .....100.0%

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FIRST AID	
<b>If swallowed:</b>	<ul style="list-style-type: none"><li>• Call a poison control center or doctor immediately for treatment advice.</li><li>• Have person sip a glass of water if able to swallow.</li><li>• Do not induce vomiting unless told to do so by the poison control center or doctor.</li><li>• Do not give anything by mouth to an unconscious person.</li></ul>
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EPA Reg. No. 84229-16

EPA Est. No.

Net Weight: Lbs.

Batch No.

**Manufactured for:**

Tide International USA, Inc.

21 Hubble

Irvine, CA 92618

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Caneberry  
Canola  
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Cotton  
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Legume Vegetables Crop Group, except soybean  
Peanuts  
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Potato (including seed piece treatment)  
Root and Tuber Vegetables Crop Subgroup, except sugar beet  
Soybean  
Strawberry  
Stone Fruit Crop Group  
Sugar Beet  
Tobacco



Greenhouse Vegetables (tomato, cucumber)

Tree Nut Crop Group, excluding Almonds  
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WARRANTIES OF MERCHANTABILITY OR OF FITNESS FOR A PARTICULAR PURPOSE NOR ANY OTHER EXPRESS OR IMPLIED WARRANTY EXCEPT AS STATED ABOVE.

To the extent consistent with applicable law, neither Tide International USA, Inc. nor Seller shall be liable for any incidental, consequential or special damages resulting from the use or handling of this product. **TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, THE EXCLUSIVE REMEDY OF THE USER OR BUYER, AND THE EXCLUSIVE LIABILITY OF TIDE INTERNATIONAL USA, INC. AND SELLER FOR ANY AND ALL CLAIMS, LOSSES, INJURIES OR DAMAGES (INCLUDING CLAIMS BASED ON BREACH OF WARRANTY, CONTRACT, NEGLIGENCE, TORT, STRICT LIABILITY OR OTHERWISE) RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT, SHALL BE THE RETURN OF THE PURCHASE PRICE OF THE PRODUCT OR, AT THE ELECTION OF TIDE INTERNATIONAL USA, INC. OR SELLER, THE REPLACEMENT OF THE PRODUCT.**

Tide International USA, Inc. and Seller offer this product, and Buyer and User accept it, subject to the foregoing Conditions of Sale and Limitation of Warranty and Liability, which may not be modified except by written agreement signed by a duly authorized representative of Tide International USA, Inc.

[EPA 20150416]

PYXIS REGULATORY CONSULTING, INC.

4110 136<sup>th</sup> St. NW  
Gig Harbor, WA 98332

Phone: 253-853-7369  
Fax: 253-853-5516  
www.PyxisRC.com

April 29, 2014

COURIER DELIVERY

Venus Eagle (PM 1)  
Document Processing Desk (**FNL LBL**)  
Office of Pesticide Programs (7504P)  
U.S. Environmental Protection Agency  
Room S-4900, One Potomac Yard  
2777 S. Crystal Drive  
Arlington, VA 22202

RE: Tide International USA, Inc. – Tide Technical Imidacloprid (EPA Reg. No. 84229-16)  
Submission of Final Product Labeling per the Agency letter dated April 22, 2014

Dear Ms. Eagle,

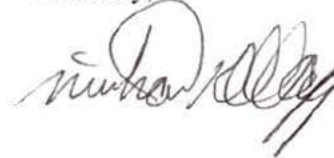
On behalf of Tide International USA, Inc. please find the enclosed final product labeling for Tide Technical Imidacloprid (EPA Reg. No. 84229-16) per the Agency letter dated April 22, 2014.

In support of this submission, we submit the following documents:

1. Completed Application for Registration (EPA Form 8570-1)
2. One (1) copy of the Tide Technical Imidacloprid final product labeling
3. Letter of Authorization

Please feel free to contact me by phone (253) 853-7369 or by email at Mike@PyxisRC.com if you have any questions or need any additional information.

Sincerely,



Michael Kellogg

Enclosures

cc: L. Gudino; Tide International USA, Inc.





United States  
Environmental Protection Agency  
Washington, DC 20460

☐ Registration  
☐ Amendment  
☒ Other

OPP Identifier Number

**Application for Pesticide - Section I**

1. Company/Product Number <b>84229-16</b>	2. EPA Product Manager V. Eagle	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Tide International USA, Inc. / Tide Technical Imidacloprid	PM# 1	
5. Name and Address of Applicant (Include ZIP Code) Tide International USA, Inc. c/o Pyxis Regulatory Consulting, Inc. 4110 136th St. NW Gig Harbor, WA 98332 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

**Section - II**

<input type="checkbox"/> Amendment - Explain below.	<input checked="" type="checkbox"/> Final printed labels in response to Agency letter dated <b>April 22, 2014</b>
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

**Explanation:** Use additional page(s) if necessary. (For section I and Section II.)

Submission of final printed label per the Agency letter dated April 22, 2014.

**Section - III**


1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		<input type="checkbox"/> Metal	
* Certification must be submitted				<input type="checkbox"/> Plastic	
				<input type="checkbox"/> Glass	
				<input type="checkbox"/> Paper	
				<input checked="" type="checkbox"/> Other (Specify) lined fiber drum	
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container 25 kg (55.12 lb), 50 kg (110.23 lb)		5. Location of Label Directions <input checked="" type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product	
6. Manner in Which Label is Affixed to Product <input checked="" type="checkbox"/> Lithograph Paper, glued Stenciled			<input type="checkbox"/> Other _____		

**Section - IV**

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)		
Name Michael Kellogg	Title Agent	Telephone No. (Include Area Code) (253) 853-7369
<b>Certification</b> I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.		6. Date Application Received (Stamped)
2. Signature 	3. Title Agent	
4. Typed Name Michael Kellogg	5. Date 4/29/14	

NOT REVIEWED  
In Accordance with PR Notice 82-2  
Based on Draft Labeling Dated

APRIL 22, 14

 <b>TIDE TECHNICAL IMIDACLOPRID</b>	
<b>FOR MANUFACTURING USE ONLY</b>	
<b>ACTIVE INGREDIENT:</b>	
Imidacloprid, 1-[(6-chloro-3-pyridinyl)methyl]-N-nitro-2-imidazolidinimine	99.0%
<b>OTHER INGREDIENTS:</b>	1.0%
<b>TOTAL:</b>	100.0%
<b>KEEP OUT OF REACH OF CHILDREN CAUTION</b>	
<b>FIRST AID</b>	
<b>If swallowed:</b>	Call a poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to do so by the poison control center or doctor. Do not give anything by mouth to an unconscious person.
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<b>EPA Reg. No.: 84229-16</b>	<b>EPA Est. No.:</b> <input type="checkbox"/> 84153-CHN-001
<b>Batch No.: See container</b>	<input type="checkbox"/> 87410-CHN-001
<b>Net Weight:</b> <input type="checkbox"/> 55.12 lbs/Drum (25 kg/Drum)	
<input type="checkbox"/> 110.23 lbs/Drum (50 kg/Drum)	
Manufactured in China Manufactured for Tide International USA, Inc. 21 Hubble Drive, CA 92618	

PEEL BACK BOOK HERE AND RESEAL AFTER OPENING

INSECTICIDE

**PRECAUTIONARY STATEMENTS  
HAZARDS TO HUMANS AND DOMESTIC ANIMALS  
CAUTION**

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sapote, Mango, Papaya, Passionfruit, Persimmon,  
Pulasan, Rambutan, Sapodilla, Soursop, Spanish lime,  
Star apple, Starfruit, Sugar apple, Wax jambu)

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**PESTICIDE DISPOSAL:** Pesticide wastes are acutely hazardous. Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

### CONTAINER HANDLING:

**Liner:** Nonrefillable container. Do not reuse or refill this container. Completely empty liner into application equipment by shaking and tapping sides and bottom to loosen clinging particles. When completely empty offer for recycling if available or dispose of liner in a sanitary landfill.

**Outer Drum:** Nonrefillable container. Do not reuse or refill this container. When completely empty offer for recycling if available or dispose of drum in a sanitary landfill.

## CONDITION OF SALE AND LIMITATION OF WARRANTY AND LIABILITY

**NOTICE:** Read the entire Directions for Use and Conditions of Sale and Limitation of Warranty and Liability before buying or using this product. If the terms are not acceptable, return the product at once, unopened, and the purchase price will be refunded.

The Directions for Use of this product must be followed carefully. It is impossible to eliminate all risks inherently associated with the use of this product. Ineffectiveness or other unintended consequences may result because of such



factors as manner of use or application, weather, presence of other materials or other influencing factors in the use of the product, which are beyond the control of Tide International USA, Inc. or Seller. To the extent consistent with applicable law, all such risks shall be assumed by Buyer and User, and Buyer and User agree to hold Tide International USA, Inc. and Seller harmless for any claims relating to such factors.

Tide International USA, Inc. warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated in the Directions for Use, subject to the inherent risks referred to above, when used in accordance with directions under normal use conditions. This warranty does not extend to the use of this product contrary to label instructions, or under abnormal conditions or under conditions not reasonably foreseeable to or beyond the control of Seller or Tide International USA, Inc., and Buyer and User assume the risk of any such use. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, TIDE INTERNATIONAL USA, INC. MAKES NO WARRANTIES OF MERCHANTABILITY OR OF FITNESS FOR A PARTICULAR PURPOSE NOR ANY OTHER EXPRESS OR IMPLIED WARRANTY EXCEPT AS STATED ABOVE.

To the extent consistent with applicable law, neither Tide International USA, Inc. nor Seller shall be liable for any incidental, consequential or special damages resulting from the use or handling of this product. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, THE EXCLUSIVE REMEDY OF THE USER OR BUYER, AND THE EXCLUSIVE LIABILITY OF TIDE INTERNATIONAL USA, INC. AND SELLER FOR ANY AND ALL CLAIMS, LOSSES, INJURIES OR DAMAGES (INCLUDING CLAIMS BASED ON BREACH OF WARRANTY, CONTRACT, NEGLIGENCE, TORT, STRICT LIABILITY OR OTHERWISE) RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT, SHALL BE THE RETURN OF THE PURCHASE PRICE OF THE PRODUCT OR, AT THE ELECTION OF TIDE INTERNATIONAL USA, INC. OR SELLER, THE REPLACEMENT OF THE PRODUCT.

Tide International USA, Inc. and Seller offer this product, and Buyer and User accept it, subject to the foregoing Conditions of Sale and Limitation of Warranty and Liability, which may not be modified except by written agreement signed by a duly authorized representative of Tide International USA, Inc.

EPA Code No.: TIC-INS8422916  
EPA20140422  
Created date: 04/23/2014



# Tide International (USA) Inc.

---

21 Hubble, Irvine, CA 92618, USA. Phone: 949-679-3535 Fax: 949-679-3538

December 28, 2009

To Whom It May Concern:

RE: Letter of Authorization

Dear Sir or Madam:

Please let this letter serve to confirm that Janelle Kay and Michael Kellogg of Pyxis Regulatory Consulting, Inc. are authorized to act as agent for Tide International USA, Inc. (EPA Company Number 84229), before the U.S. Environmental Protection Agency, California Department of Pesticide Regulation Pesticide Registration Branch and other state governmental agencies in all matters regarding our pesticide registrations pursuant to the Federal Insecticide, Fungicide and Rodenticide Act ("FIFRA"), 7 U.S.C. § 136 et seq. and state law.

If you have any questions, please do not hesitate to contact me.

Sincerely,

Der-I Wang, Ph.D.

Vice President

cc: Pyxis Regulatory Consulting, Inc.

# Material Sent for Data Extraction

Reg. # 84229-16

Description: Amend

☒ Material(s) Sent to Data Extraction Contractors:

☒ New Stamped Label Dated 4/22/14

☐ Notification Dated \_\_\_\_\_

☐ New CSF(s) Dated \_\_\_\_\_

☐ Other: \_\_\_\_\_

☐ Decision #: \_\_\_\_\_

☐ Other Action/Comments: \_\_\_\_\_  
\_\_\_\_\_

File this coversheet and attached materials in the jacket. It must be well organized and clipped together, NOT STAPLED. Then give the jacket with the coversheet and materials to staff in the Information Services Center (ISC) (Room S-4900). If a jacket is full or only available as an image, please file materials in a new jacket and bring it down to the (ISC). For further information please call 703-605-0716.

Reviewer: Jennifer Urbanski

Phone: 347-0156 Division: RD

Date: 4/22/14



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

OFFICE OF  
CHEMICAL SAFETY AND  
POLLUTION PREVENTION

Ann M. Tillman  
AmTide LLC  
c/o/ Pyxis Regulatory Consulting Inc.  
4110 136<sup>th</sup> St. NW  
Gig Harbor, WA 98332

APR 22 2014

Subject: Amended label to delete use on companion animals and to make minor changes to the storage and disposal and warranty sections  
Product Name: Tide Technical Imidacloprid  
EPA Reg. No. 84229-16  
Decision #: 490067  
Submission dated April 8, 2014

Dear Ms. Tillman:

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable. A stamped copy is enclosed for your records. Please submit one copy of your final printed labeling before you release the product for shipment. If you have any questions regarding this label, please contact Dr. Jennifer Urbanski at 703-347-0156 or [urbanski.jennifer@epa.gov](mailto:urbanski.jennifer@epa.gov).

Sincerely yours,

A handwritten signature in black ink, which appears to read "Venus Eagle", is written over a horizontal line.

Venus Eagle  
Product Manager (01)  
Insecticide-Rodenticide Branch  
Registration Division (7505P)

Enclosure- Stamped Label



**Tide Technical Imidacloprid**  
**FOR MANUFACTURING USE ONLY**

**ACTIVE INGREDIENT:**

Imidacloprid,

1-[(6-chloro-3-pyridinyl)methyl]-N-nitro-2-imidazolidinimine ..... 99.0%

**OTHER INGREDIENTS:** ..... 1.0%

**TOTAL:** ..... 100.0%

**KEEP OUT OF REACH OF CHILDREN**  
**CAUTION**

FIRST AID	
If swallowed:	<ul style="list-style-type: none"><li>• Call a poison control center or doctor immediately for treatment advice.</li><li>• Have person sip a glass of water if able to swallow.</li><li>• Do not induce vomiting unless told to do so by the poison control center or doctor.</li><li>• Do not give anything by mouth to an unconscious person.</li></ul>
<b>NOTE TO PHYSICIAN</b>	
No specific antidote is available. Treat symptomatically.	
<b>HOT LINE NUMBER</b>	
Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact CHEMTREC at 1-800-424-9300 for emergency medical treatment information.	

EPA Reg. No. 84229-16

EPA Est. No.

**Manufactured for:**

Tide International USA, Inc.

21 Hubble

Irvine, CA 92618

Net Weight: Lbs.

Batch No.

ACCEPTED

APR 22 2014

Under the Federal Insecticide, Fungicide,  
and Rodenticide Act, as amended, for the  
pesticide registered under:

EPA. Reg. No: 84229-16

**PRECAUTIONARY STATEMENTS**  
**HAZARDS TO HUMANS AND DOMESTIC ANIMALS**  
**CAUTION**

Harmful if swallowed. Wash thoroughly with soap and water after handling and before eating, drinking, or using tobacco. Wear long-sleeved shirt and long pants, socks, shoes and chemical resistant gloves made of any waterproof material such as barrier laminate, butyl rubber, nitrile rubber, neoprene rubber, natural rubber, polyethylene, polyvinylchloride (PVC) or viton.

**ENVIRONMENTAL HAZARDS**

This product is highly toxic to aquatic invertebrates. Keep out of lakes, streams, or ponds. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans, or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the EPA.

**DIRECTIONS FOR USE**

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. This product is to be used only for formulation into registered insecticide products and is not for resale under this label.

**Instructions to Formulators:** This technical product may be used to manufacture insecticide end-use products for:

- 1) Terrestrial Non-Food Crop, Residential, and Commercial Outdoor (including Greenhouses): lawn, turf and ornamentals (trees, shrubs, evergreens, flowers, foliage plants, groundcovers) in and around residential or commercial buildings; Christmas trees; Poplar/Cottonwood trees.
- 2) Residential and Commercial Indoor Non-Food: Greenhouse ornamentals; interior landscapes.
- 3) Indoor Non-food Use: Tide Technical Imidacloprid can be formulated into end-use aqueous and solvent system products for pressure treatment of wood products [millwork (window frames, wood doors, doorframes, etc.), in-ground contact uses (wood products – pilings, telephone poles, wood building materials, etc.); sapstain control (fresh-cut lumber)] to protect against termites.
- 4) Terrestrial Food Crops:

Artichoke (Globe)	Herb Crop Subgroup 19A
Banana & Plantain	Hops
Bushberry Crop Subgroup	Leafy Petiole Vegetables Crop Subgroup
Brassica (Cole) Crop Group	Leafy Vegetables Crop Subgroup
Bulb Vegetables Crop Group	Legume Vegetables Crop Group, except soybean
Caneberry	Peanuts
Canola	Pome Fruit Crop Group
Cereal Grain Crop Group (barley, oat, rye, sorghum, wheat), excluding rice	Pomegranate
Citrus Crop Group (containerized and field)	Potato (including seed piece treatment)
Coffee	Root and Tuber Vegetables Crop Subgroup, except sugar beet
Cotton	Soybean
Cranberry	Strawberry
Cucurbit Crop Group	Stone Fruit Crop Group
Fruiting Vegetable Crop Group	Sugar Beet
Grapes	Tobacco

Greenhouse Vegetables (tomato, cucumber)

Tree Nut Crop Group, excluding Almonds  
Tropical Fruit (Acerola, Atemoya, Avocado, Black sapote, Canistel, Cherimoya, Custard apple, Feijoa, Jaboticaba, Guava, Llama, Longan, Lychee, Mamey sapote, Mango, Papaya, Passionfruit, Persimmon, Pulasan, Rambutan, Sapodilla, Soursop, Spanish lime, Star apple, Starfruit, Sugar apple, Wax jambu)

- 5) Uses for which U. S. EPA has accepted the required data and/or citation of data that the formulator has submitted in support of registration;
- 6) Uses for experimental purposes that are in compliance with U.S. EPA requirements

#### STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

**PESTICIDE STORAGE:** Store in a cool, dry place away from food, drink and animal feeding stuffs. If spilled, do not flush to waterways (see Environmental Hazards). Carefully collect and containerize spilled material in a manner that produces the least amount of airborne dust. Suitable protective equipment should be worn during any spill cleanup operation (see Precautionary Statements). Residual surface material may be removed with towels moistened with methanol.

**PESTICIDE DISPOSAL:** Pesticide wastes are acutely hazardous. Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

#### CONTAINER HANDLING:

**Liner:** Nonrefillable container. Do not reuse or refill this container. Completely empty liner into application equipment by shaking and tapping sides and bottom to loosen clinging particles. When completely empty offer for recycling if available or dispose of liner in a sanitary landfill.

**Outer Drum:** Nonrefillable container. Do not reuse or refill this container. When completely empty offer for recycling if available or dispose of box in a sanitary landfill.

#### CONDITION OF SALE AND LIMITATION OF WARRANTY AND LIABILITY

**NOTICE:** Read the entire Directions for Use and Conditions of Sale and Limitation of Warranty and Liability before buying or using this product. If the terms are not acceptable, return the product at once, unopened, and the purchase price will be refunded.

The Directions for Use of this product must be followed carefully. It is impossible to eliminate all risks inherently associated with the use of this product. Ineffectiveness or other unintended consequences may result because of such factors as manner of use or application, weather, presence of other materials or other influencing factors in the use of the product, which are beyond the control of Tide International USA, Inc. or Seller. To the extent consistent with applicable law, all such risks shall be assumed by Buyer and User, and Buyer and User agree to hold Tide International USA, Inc. and Seller harmless for any claims relating to such factors.

Tide International USA, Inc. warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated in the Directions for Use, subject to the inherent risks referred to above, when used in accordance with directions under normal use conditions. This warranty does not extend to the use of this product contrary to label instructions, or under abnormal conditions or under conditions not reasonably foreseeable to or beyond the control of Seller or Tide International USA, Inc., and Buyer and User assume the risk of any such use. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, TIDE INTERNATIONAL USA, INC. MAKES NO WARRANTIES OF MERCHANTABILITY OR OF FITNESS FOR A PARTICULAR PURPOSE NOR ANY OTHER EXPRESS OR IMPLIED WARRANTY EXCEPT AS STATED ABOVE.

To the extent consistent with applicable law, neither Tide International USA, Inc. nor Seller shall be liable for any incidental, consequential or special damages resulting from the use or handling of this product. **TO THE EXTENT**

**CONSISTENT WITH APPLICABLE LAW, THE EXCLUSIVE REMEDY OF THE USER OR BUYER, AND THE EXCLUSIVE LIABILITY OF TIDE INTERNATIONAL USA, INC. AND SELLER FOR ANY AND ALL CLAIMS, LOSSES, INJURIES OR DAMAGES (INCLUDING CLAIMS BASED ON BREACH OF WARRANTY, CONTRACT, NEGLIGENCE, TORT, STRICT LIABILITY OR OTHERWISE) RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT, SHALL BE THE RETURN OF THE PURCHASE PRICE OF THE PRODUCT OR, AT THE ELECTION OF TIDE INTERNATIONAL USA, INC. OR SELLER, THE REPLACEMENT OF THE PRODUCT.**

Tide International USA, Inc. and Seller offer this product, and Buyer and User accept it, subject to the foregoing Conditions of Sale and Limitation of Warranty and Liability, which may not be modified except by written agreement signed by a duly authorized representative of Tide International USA, Inc.

[20140408]





United States  
Environmental Protection Agency  
Washington, DC 20460

☐ Registration  
☒ Amendment  
☐ Other

OPP Identifier Number

## Application for Pesticide - Section I

1. Company/Product Number 84229-16	2. EPA Product Manager V. Eagle	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Tide International USA Inc./Tide Technical Imidacloprid	PM# 01	
5. Name and Address of Applicant (Include ZIP Code) AmTide LLC c/o Pyxis Regulatory Consulting, Inc. 4110 136th St. NW Gig Harbor, WA 98332 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

## Section - II

<input checked="" type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Submission of label amendment to delete use sites and make minor corrections to the Storage and Disposal section.

## Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No		<input type="checkbox"/> Metal	
				<input type="checkbox"/> Plastic	
				<input type="checkbox"/> Glass	
				<input type="checkbox"/> Paper	
				<input type="checkbox"/> Other (Specify) _____	
* Certification must be submitted		If "Yes" Unit Packaging wgt.	No. per container	If "Yes" Package wgt	No. per container
3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container		5. Location of Label Directions <input type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product	
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled		<input type="checkbox"/> Other _____			

## Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)		
Name Ann M. Tillman	Title Agent	Telephone No. (Include Area Code) (253) 353-7369
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment, both under applicable law.		6. Date Application Received (Stamped)
2. Signature 	3. Title Agent	
4. Typed Name Ann M. Tillman	5. Date 4/8/14	

PYXIS REGULATORY CONSULTING, INC.

4110 136<sup>th</sup> St. NW  
Gig Harbor, WA 98332

Phone: 253-853-7369  
Fax: 253-853-5516  
[www.PyxisRC.com](http://www.PyxisRC.com)

April 8, 2014

COURIER DELIVERY

Venus Eagle (PM 1)  
Document Processing Desk (**AMEND**)  
Office of Pesticide Programs (7504P)  
U.S. Environmental Protection Agency  
Room S-4900, One Potomac Yard  
2777 S. Crystal Drive  
Arlington, VA 22202

Dear Ms. Eagle,

RE: Tide International USA, Inc.  
Tide Technical Imidacloprid (EPA Reg. No. 84229-16)  
Amendment to Delete Use Sites

Dear Ms. Eagle,

On behalf of AmTide, LLC, I am submitting an application to amend the registration of Tide Technical Imidacloprid (EPA Reg. No. 84229-16) to delete uses (companion animal). Tide International USA, Inc. waives the 180-day comment period for deletion of this use. In addition, I took this opportunity to make minor changes in the Storage and Disposal section and to add a phrase in the Conditions of Sale and Limitation of Warranty and Liability section.

In support of this label amendment we submit the following documents:

1. Completed Application for Amendment (EPA Form 8570-1)
2. One (1) copy of the Tide Technical Imidacloprid label with changes tracked
3. Three (3) copies of the Tide Technical Imidacloprid label with changes incorporated
4. A CD containing an electronic version of the amended label
5. Certification with Respect to Label Integrity
6. Letter of Authorization

Please feel free to contact me ([Ann@PyxisRC.com](mailto:Ann@PyxisRC.com); (253) 853-7369) if you have any questions or need any additional information.

Sincerely,



Ann M. Tillman

Enclosures

cc: D. Pfeiffer; Tide International USA, Inc.

# Certification with Respect to Label Integrity

version: 9/11/02

I certify that the information (including, but not limited to, text, tables, and graphics) contained in the electronic file identified below by file name and submitted with this certification is the same information as that on the paper copies of these documents included with this submission.

PROPOSED LABEL		
EPA Registration #	Date Submitted to EPA	Electronic file name
084229-16	Apr. 8, 2104	84229-16.20140408.Tide Technical Imidacloprid label.amendment.pdf

I certify that the statements that I have made on this form are true, accurate, and complete. I acknowledge that any knowingly false or misleading statements may be punishable by fine or imprisonment or both under applicable law.



Signature  
Ann M. Tillman  
Agent, Tide International USA, Inc.

Apr. 8, 2013  
Date





# Tide International (USA) Inc.

---

21 Hubble, Irvine, CA 92618, USA. Phone: 949-679-3535 Fax: 949-679-3538

December 28, 2009

To Whom It May Concern:

RE: Letter of Authorization

Dear Sir or Madam:

Please let this letter serve to confirm that Janelle Kay and Michael Kellogg of Pyxis Regulatory Consulting, Inc. are authorized to act as agent for Tide International USA, Inc. (EPA Company Number 84229), before the U.S. Environmental Protection Agency, California Department of Pesticide Regulation Pesticide Registration Branch and other state governmental agencies in all matters regarding our pesticide registrations pursuant to the Federal Insecticide, Fungicide and Rodenticide Act ("FIFRA"), 7 U.S.C. § 136 et seq. and state law.

If you have any questions, please do not hesitate to contact me.

Sincerely,

Der-I Wang, Ph.D.

Vice President

cc: Pyxis Regulatory Consulting, Inc.



April 11, 2014

OFFICE OF CHEMICAL SAFETY  
AND POLLUTION PREVENTION

MS. JANELLE KAY  
PYXIS REGULATORY CONSULTING, INC  
TIDE INTERNATIONAL, USA, INC.  
4110 136TH ST. NW  
GIG HARBOR, WA 98332-

PRODUCT NAME: TIDE TECHNICAL IMIDACLOPRID  
COMPANY NAME: TIDE INTERNATIONAL, USA, INC.  
OPP IDENTIFICATION NUMBER:  
EPA FILE SYMBOL: 84229-16  
EPA RECEIPT DATE: 04/09/14

SUBJECT: RECEIPT OF AMENDMENT

DEAR REGISTRANT:

The Office of Pesticide Programs has received your application for an amendment and it has passed an administrative screen for completeness.

During the initial screen we determined that the application appears to qualify for fast track review. The package will now be forwarded to the Product Manager for review to determine its acceptability for fast track status.

If you have any questions, please contact Registration Division, Risk Management Team 1, at (703) 308-8045.

Sincerely,

A handwritten signature in cursive script, appearing to read "Lewi Vike", is written over the typed name.

Front End Processing Staff  
Information Services Branch  
Information Technology & Resources Management Division

**Fee for Service**

*W*  
{950420h~

This package includes the following

☐ New Registration

☒ Amendment

☐ Studies?      ☐ Fee Waiver?

☐ volpay    % Reduction: \_\_\_\_

for Division

☐ AD

☐ BPPD

☒ RD

Risk Mgr.   

Receipt No.

S-

EPA File Symbol/Reg. No.

Pin-Punch Date:

☒ This item is NOT subject to FFS action.

Action Code:

Requested:

Granted:

Amount Due: \$ \_\_\_\_

Parent/Child Decisions:

☐ Inert Cleared for Intended Use

☐ Uncleared Inert in Product

Reviewer: Steve Chaible      Date: 4/10/14

Remarks:



# FAST-TRACK AMENDMENTS - Completeness Screening Checklist

Expert's In-Processing Signature: S. Hill

Date: 4/10/14

PM #: 1

EPA Reg. Number: 84229-16

EPA Receipt Date: 4/9/14

1 **Application Form** (EPA Form 8570-1) - signed?

Y

2 **Confidential Statement of Formula** (EPA Form 8570-29) - signed?

3 **Certification with Respect to Citation of Data** (EPA Form 8570-34) - signed?

4 **Formulator's Exemption Statement** (EPA Form 8570-27) - signed?

5 **Data Matrix** (EPA Form 8570-35) [Applicable for adding me-too uses] - signed?

a) Selective Method?

b) Cite-All Method?

c) Public copy of Matrix provided? See PR Notice 98-5

6 **Is Label included?** (5 copies)

Y

a) Electronic Label submitted?

Y

## Comments:

Deleting companion animal use.

Jen

**PYXIS REGULATORY CONSULTING, INC.**

4110 136<sup>th</sup> St. NW  
Gig Harbor, WA 98332

Phone: 253-853-7369  
Fax: 253-853-5516  
www.PyxisRC.com

August 16, 2012

**COURIER DELIVERY**

Venus Eagle (PM 1)  
Document Processing Desk (**FNL LBL**)  
Office of Pesticide Programs (7504P)  
U.S. Environmental Protection Agency  
Room S-4900, One Potomac Yard  
2777 S. Crystal Drive  
Arlington, VA 22202

RE: Tide International USA, Inc. – Tide Technical Imidacloprid (EPA Reg. No. 84229-16)  
Submission of Final Product Labeling per the Agency letter dated August 14, 2012

Dear Ms. Eagle,

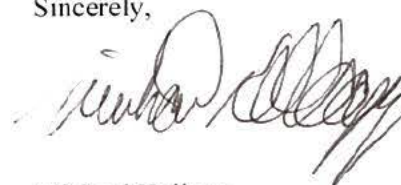
On behalf of Tide International USA, Inc. please find the enclosed final product labeling for Tide Technical Imidacloprid (EPA Reg. No. 84229-16) per the Agency letter dated August 14, 2012.

In support of this submission, we submit the following documents:

1. Completed Application for Registration (EPA Form 8570-1)
2. One (1) copy of the Tide Technical Imidacloprid final product labeling
3. Letter of Authorization

Please feel free to contact me by phone (253) 853-7369 or by email at Mike@PyxisRC.com if you have any questions or need any additional information.

Sincerely,



Michael Kellogg

Enclosures

cc: D. Wang; Tide International USA, Inc.



United States  
Environmental Protection Agency  
Washington, DC 20460

☐ Registration  
☐ Amendment  
☒ Other

OPP Identifier Number

## Application for Pesticide - Section I

1. Company/Product Number 84229-16	2. EPA Product Manager V. Eagle	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Tide International USA, Inc. / Tide Technical Imidacloprid	PM# 1	
5. Name and Address of Applicant (Include ZIP Code) Tide International USA, Inc. c/o Pyxis Regulatory Consulting, Inc. 4110 136th St. NW Gig Harbor, WA 98332 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

## Section - II

<input type="checkbox"/> Amendment - Explain below.	<input checked="" type="checkbox"/> Final printed labels in response to Agency letter dated August 14, 2012
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Submission of final printed label per the Agency letter dated August 14, 2012.

## Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		<input type="checkbox"/> Metal	
				<input type="checkbox"/> Plastic	
				<input type="checkbox"/> Glass	
				<input type="checkbox"/> Paper	
				<input checked="" type="checkbox"/> Other (Specify) lined fiber drum	
* Certification must be submitted		If "Yes" Unit Packaging wgt.	No. per container	If "Yes" Package wgt	No. per container
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container 25 kg (55.12 lb), 50 kg (110.23 lb)		5. Location of Label Directions <input checked="" type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product	
6. Manner in Which Label is Affixed to Product <input checked="" type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled				<input type="checkbox"/> Other _____	

## Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)			
Name Michael Kellogg		Title Agent	
		Telephone No. (Include Area Code) (253) 853-7369	
<b>Certification</b> I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.			6. Date Application Received (Stamped)
2. Signature 		3. Title Agent	
4. Typed Name Michael Kellogg		5. Date 8/16/12	





# Tide International (USA) Inc.

---

21 Hubble, Irvine, CA 92618, USA. Phone: 949-679-3535 Fax: 949-679-3538

December 28, 2009

To Whom It May Concern:

RE: Letter of Authorization

Dear Sir or Madam:

Please let this letter serve to confirm that Janelle Kay and Michael Kellogg of Pyxis Regulatory Consulting, Inc. are authorized to act as agent for Tide International USA, Inc. (EPA Company Number 84229), before the U.S. Environmental Protection Agency, California Department of Pesticide Regulation Pesticide Registration Branch and other state governmental agencies in all matters regarding our pesticide registrations pursuant to the Federal Insecticide, Fungicide and Rodenticide Act ("FIFRA"), 7 U.S.C. § 136 et seq. and state law.

If you have any questions, please do not hesitate to contact me.

Sincerely,

Der-I Wang, Ph.D.

Vice President

cc: Pyxis Regulatory Consulting, Inc.

From: (253) 853-7369  
Janelle Kay  
PYXIS REGULATORY CONSULTING  
4110 136th St. NW

Origin ID: TCMA



J12201207160325

Gig Harbor, WA 98332

Ship Date: 16AUG12  
ActWgt: 1.0 LB  
CAD: 4575934/INET3300

Delivery Address Bar Code



SHIP TO: (253) 853-7369

BILL SENDER

Document Processing Desk (FNL LBL)  
U.S. EPA OPP (7504P)  
2777 CRYSTAL DR  
ROOM S-4900, ONE POTOMAC YARD  
ARLINGTON, VA 22202

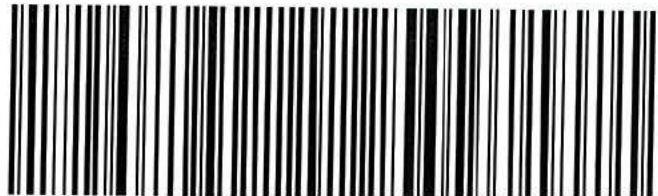
Ref # Tide - imidacloprid  
Invoice #  
PO #  
Dept #

TUE - 21 AUG A1  
EXPRESS SAVER

TRK# 7987 5764 4366  
0201


**SA WASA**

22202  
VA-US  
DCA



NOT REVIEWED  
In Accordance with PR Notice 82-2  
Based on Draft Labeling Dated

8/14/12

 <b>TIDE TECHNICAL IMIDACLOPRID</b>	
<b>FOR MANUFACTURING USE ONLY</b>	
<b>ACTIVE INGREDIENT:</b> Imidacloprid, 1-[16-chloro-3-pyridinylmethyl]-N-nitro-2-imidazolidinimine	
<b>OTHER INGREDIENTS:</b>	
<b>TOTAL:</b>	100.0%
<b>KEEP OUT OF REACH OF CHILDREN</b>	
<b>CAUTION</b>	
<b>FIRST AID</b>	
<b>If swallowed:</b>	Call a poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to do so by the poison control center or doctor. Do not give anything by mouth to an unconscious person.
<b>NOTE TO PHYSICIAN</b>	
No specific antidote is available. Treat symptomatically.	
<b>HOT LINE NUMBER</b>	
Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact CHEMTREC at 1-800-424-9300 for emergency medical treatment information.	
<b>EPA Reg. No.: 84229-16</b>	<b>EPA Est. No.: 84153-CHN-001</b>
<b>Batch No.: See container</b>	
<b>Net Weight:</b> <input type="checkbox"/> 55.12 lbs/Drum (25 kg/Drum) <input type="checkbox"/> 110.23 lbs/Drum (50 kg/Drum)	
Manufactured in China Manufactured for: Tide International USA, Inc. 21 Hubble Irvine, CA 92618	

PEEL BACK BOOK HERE AND RESEAL AFTER OPENING

INSECTICIDE



**PRECAUTIONARY STATEMENTS  
HAZARDS TO HUMANS AND DOMESTIC ANIMALS**

**CAUTION**

Harmful if swallowed. Wash thoroughly with soap and water after handling and before eating, drinking, or using tobacco. Wear long-sleeved shirt and long pants, socks, shoes and chemical resistant gloves made of any waterproof material such as barrier laminate, butyl rubber, nitrile rubber, neoprene rubber, natural rubber, polyethylene, polyvinylchloride (PVC) or viton.

**ENVIRONMENTAL HAZARDS**

This product is highly toxic to aquatic invertebrates. Keep out of lakes, streams, or ponds. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans, or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the EPA.

**DIRECTIONS FOR USE**

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. This product is to be used only for formulation into registered insecticide products and is not for resale under this label.

**Instructions to Formulators:** This technical product may be used to manufacture insecticide end-use products for:

- 1) Terrestrial Non-Food Crop, Residential, and Commercial Outdoor (including Greenhouses): lawn, turf and ornamentals (trees, shrubs, evergreens, flowers, foliage plants, groundcovers) in and around residential or commercial buildings; Christmas trees; Poplar/Cottonwood trees.
- 2) Residential and Commercial Indoor Non-Food: Greenhouse ornamentals; interior plantscapes.
- 3) Terrestrial Non-food Crop Use, Domestic Indoor & Outdoor Use: companion animals.
- 4) Indoor Non-food Use: Tide Technical Imidacloprid can be formulated into end-use aqueous and solvent system products for pressure treatment of wood products [millwork (window frames, wood doors, doorframes, etc.), in-ground contact uses (wood products - pilings, telephone poles, wood building materials, etc.); sapstain control (fresh-cut lumber)] to protect against termites.
- 5) Terrestrial Food Crops:

Artichoke (Globe)	Herb Crop Subgroup 19A
Banana & Plantain	Hops
Bushberry Crop Subgroup	Leafy Petiole Vegetables Crop Subgroup
Brassica (Cole) Crop Group	Leafy Vegetables Crop Subgroup
Bulb Vegetables Crop Group	Legume Vegetables Crop Group, except soybean
Caneberry	Peanuts
Canola	Pome Fruit Crop Group
Cereal Grain Crop Group (barley, oat, rye, sorghum, wheat), excluding rice	Pomegranate
Citrus Crop Group (containerized and field)	Potato (including seed piece treatment)
Coffee	Root and Tuber Vegetables Crop Subgroup, except sugar beet

Cotton  
Cranberry  
Cucurbit Crop Group  
Fruiting Vegetable Crop Group  
Grapes  
Greenhouse Vegetables (tomato, cucumber)

Soybean  
Strawberry  
Stone Fruit Crop Group  
Sugar Beet  
Tobacco  
Tree Nut Crop Group, excluding Almonds  
Tropical Fruit (Acerola, Atemoya, Avocado, Black sapote, Canistel, Cherimoya, Custard apple, Feijoa, Jaboticaba, Guava, Llama, Longan, Lychee, Mamey sapote, Mango, Papaya, Passionfruit, Persimmon, Pulasan, Rambutan, Sapodilla, Soursop, Spanish lime, Star apple, Starfruit, Sugar apple, Wax jambu)

6) Uses for which U. S. EPA has accepted the required data and/or citation of data that the formulator has submitted in support of registration;

7) Uses for experimental purposes that are in compliance with U.S. EPA requirements

## STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

**PESTICIDE STORAGE:** Store in a cool, dry place away from food, drink and animal feeding stuffs. If spilled, do not flush to waterways (see Environmental Hazards). Carefully collect and containerize spilled material in a manner that produces the least amount of airborne dust. Suitable protective equipment should be worn during any spill cleanup operation (see Precautionary Statements). Residual surface material may be removed with towels moistened with methanol.

**PESTICIDE DISPOSAL:** Pesticide wastes are acutely hazardous. Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

### CONTAINER DISPOSAL:

**Container Disposal – Liner:** Nonrefillable container. Do not reuse or refill this container. Completely empty liner into application equipment by shaking and tapping sides and bottom to loosen clinging particles. When completely empty offer for recycling if available or dispose of liner in a sanitary landfill.

**Container Disposal – Outer Drum:** Nonrefillable container. Do not reuse or refill this container. When completely empty offer for recycling if available or dispose of box in a sanitary landfill.

## CONDITION OF SALE AND LIMITATION OF WARRANTY AND LIABILITY

**NOTICE:** Read the entire Directions for Use and Conditions of Sale and Limitation of Warranty and Liability before buying or using this product. If the terms are not acceptable, return the product at once, unopened, and the purchase price will be refunded.

The Directions for Use of this product must be followed carefully. It is impossible to eliminate all risks inherently associated with the use of this product. Ineffectiveness or other unintended consequences may result because of such

factors as manner of use or application, weather, presence of other materials or other influencing factors in the use of the product, which are beyond the control of Tide International USA, Inc. or Seller. All such risks shall be assumed by Buyer and User, and Buyer and User agree to hold Tide International USA, Inc. and Seller harmless for any claims relating to such factors.

Tide International USA, Inc. warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated in the Directions for Use, subject to the inherent risks referred to above, when used in accordance with directions under normal use conditions. This warranty does not extend to the use of this product contrary to label instructions, or under abnormal conditions or under conditions not reasonably foreseeable to or beyond the control of Seller or Tide International USA, Inc., and Buyer and User assume the risk of any such use. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, TIDE INTERNATIONAL USA, INC. MAKES NO WARRANTIES OF MERCHANTABILITY OR OF FITNESS FOR A PARTICULAR PURPOSE NOR ANY OTHER EXPRESS OR IMPLIED WARRANTY EXCEPT AS STATED ABOVE.

To the extent consistent with applicable law, neither Tide International USA, Inc. or Seller shall be liable for any incidental, consequential or special damages resulting from the use or handling of this product. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, THE EXCLUSIVE REMEDY OF THE USER OR BUYER, AND THE EXCLUSIVE LIABILITY OF TIDE INTERNATIONAL USA, INC. AND SELLER FOR ANY AND ALL CLAIMS, LOSSES, INJURIES OR DAMAGES (INCLUDING CLAIMS BASED ON BREACH OF WARRANTY, CONTRACT, NEGLIGENCE, TORT, STRICT LIABILITY OR OTHERWISE) RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT, SHALL BE THE RETURN OF THE PURCHASE PRICE OF THE PRODUCT OR, AT THE ELECTION OF TIDE INTERNATIONAL USA, INC. OR SELLER, THE REPLACEMENT OF THE PRODUCT.

Tide International USA, Inc. and Seller offer this product, and Buyer and User accept it, subject to the foregoing Conditions of Sale and Limitation of Warranty and Liability, which may not be modified except by written agreement signed by a duly authorized representative of Tide International USA, Inc.

EPA Code No.: TIC-INS8422916  
EPA20120814  
Created date: 08/15/2012



**PYXIS REGULATORY CONSULTING, INC.**

4110 136<sup>th</sup> St. NW  
Gig Harbor, WA 98332

Phone: 253-853-7369  
Fax: 253-853-5516  
www.PyxisRC.com

June 18, 2012

**COURIER DELIVERY**

Venus Eagle (PM 1)  
Document Processing Desk (**FNL LBL**)  
Office of Pesticide Programs (7504P)  
U.S. Environmental Protection Agency  
Room S-4900, One Potomac Yard  
2777 S. Crystal Drive  
Arlington, VA 22202

RE: Tide International USA, Inc. – Tide Technical Imidacloprid (EPA Reg. No. 84229-16)  
Submission of Final Product Labeling per the Agency letter dated November 5, 2010

Dear Ms. Eagle,

On behalf of Tide International USA, Inc. please find the enclosed final product labeling for Tide Technical Imidacloprid (EPA Reg. No. 84229-16) per the Agency letter dated November 5, 2010.

In support of this submission, we submit the following documents:

1. Completed Application for Registration (EPA Form 8570-1)
2. One (1) copy of the Tide Technical Imidacloprid final product labeling
3. Letter of Authorization

Please feel free to contact me by phone (253) 853-7369 or by email at [Ross@PyxisRC.com](mailto:Ross@PyxisRC.com) if you have any questions or need any additional information.

Sincerely,



Ross Gilbert

Enclosures

cc: D. Wang; Tide International USA, Inc.



United States  
Environmental Protection Agency  
Washington, DC 20460

☐ Registration  
☐ Amendment  
☒ Other

OPP Identifier Number

**Application for Pesticide - Section I**

1. Company/Product Number 84229-16	2. EPA Product Manager V. Eagle	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Tide International USA, Inc. / Tide Technical Imidacloprid	PM# 1	
5. Name and Address of Applicant (Include ZIP Code) Tide International USA, Inc. c/o Pyxis Regulatory Consulting, Inc. 4110 136th St. NW Gig Harbor, WA 98332 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

**Section - II**

<input type="checkbox"/> Amendment - Explain below.	<input checked="" type="checkbox"/> Final printed labels in response to Agency letter dated November 5, 2010
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

**Explanation:** Use additional page(s) if necessary. (For section I and Section II.)

Submission of final printed label per the Agency letter dated November 5, 2010.

**Section - III**

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		<input type="checkbox"/> Metal	
				<input type="checkbox"/> Plastic	
				<input type="checkbox"/> Glass	
				<input type="checkbox"/> Paper	
				<input checked="" type="checkbox"/> Other (Specify) lined fiber drum	
* Certification must be submitted					
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container 2.2 kg (5 lb), 20 kg (44 lb), 25 kg (55)		5. Location of Label Directions <input checked="" type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product	
6. Manner in Which Label is Affixed to Product <input checked="" type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled		<input type="checkbox"/> Other _____			

**Section - IV**

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)			
Name Ross Gilbert		Title Agent	
		Telephone No. (Include Area Code) (250) 853-7369	
<b>Certification</b> I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment both under applicable law.			6. Date Application Received (Stamped)
2. Signature 		3. Title Agent	
4. Typed Name Ross Gilbert		5. Date 6/13/2012	

NOT REVIEWED  
In Accordance with PR Notice 82-2  
Based on Draft Labeling Dated

11/5/10



## TIDE TECHNICAL IMIDACLOPRID

FOR MANUFACTURING USE ONLY

**ACTIVE INGREDIENT:**

Imidacloprid, 1-[(6-chloro-3-pyridinyl)methyl]-N-nitro-2-imidazolidinimine.....99.0%

**OTHER INGREDIENTS:**.....1.0%

**TOTAL:**.....100.0%

**KEEP OUT OF REACH OF CHILDREN  
CAUTION**

**FIRST AID**

**If  
swallowed:**

- Call a poison control center or doctor immediately for treatment advice.
- Have person sip a glass of water if able to swallow.
- Do not induce vomiting unless told to do so by the poison control center or doctor.
- Do not give anything by mouth to an unconscious person.

**NOTE TO PHYSICIAN**

No specific antidote is available. Treat symptomatically.

**HOT LINE NUMBER**

Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact CHEMTREC at 1-800-424-9300 for emergency medical treatment information.

EPA Reg. No.: 84229-16  
Batch No.: See container

EPA Est. No.: 84153-CHN-001

**Net Weight:** ☐ 55.12 lbs/Drum (25 kg/Drum)  
☐ 110.23 lbs/Drum (50 kg/Drum)

Manufactured in China  
Manufactured for  
Tide International USA, Inc.  
21 Hubble, Irvine, CA 92618

**INSECTICIDE**

PEEL BACK BOOK HERE AND RESEAL AFTER OPENING



**PRECAUTIONARY STATEMENTS  
HAZARDS TO HUMANS AND DOMESTIC ANIMALS  
CAUTION**

Harmful if swallowed. Wash thoroughly with soap and water after handling and before eating, drinking, or using tobacco. Wear long-sleeved shirt and long pants, socks, shoes and chemical resistant gloves made of any waterproof material such as barrier laminate, butyl rubber, nitrile rubber, neoprene rubber, natural rubber, polyethylene, polyvinylchloride (PVC) or viton.

**ENVIRONMENTAL HAZARDS**

This product is highly toxic to aquatic invertebrates. Keep out of lakes, streams, or ponds. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans, or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the EPA.

**DIRECTIONS FOR USE**

It is a violation of Federal law to use this product in a manner inconsistent with its labeling. This product is to be used only for formulation into registered insecticide products and is not for resale under this label.

**Instructions to Formulators:** This technical product may be used to manufacture insecticide end-use products for:

- 1) Terrestrial Non-Food Crop, Residential and Commercial Outdoor (including Greenhouses): lawn, turf and ornamentals in and around residential or commercial buildings;
- 2) Residential and Commercial Indoor Non-Food: Greenhouse ornamentals
- 3) Terrestrial Non-food Crop Use, Domestic Indoor & Outdoor Use: companion animals.
- 4) Uses for which U. S. EPA has accepted the required data and/or citation of data that the formulator has submitted in support of registration;
- 5) Uses for experimental purposes that are in compliance with U.S. EPA requirements; and
- 6) Terrestrial Food Crops, including:

Barley  
Head and Stem *Brassica* Vegetables  
Bushberries  
Canola  
Citrus (containerized and field)  
Cotton  
Cranberries  
Fruiting Vegetables  
Grapes  
Greenhouse Vegetables (tomato, cucumber)  
Hops  
Leafy Petiole Vegetables  
Leafy Vegetables  
Legume Vegetables

Pecan  
Pome Fruits  
Potato (including seed piece treatment)  
Root Vegetables  
Strawberries  
Stone Fruit  
Sugarbeet  
Tobacco  
Tuberous and Corm Vegetables  
Tropical Fruits  
Oats  
Rye  
Sorghum  
Wheat



## STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

**PESTICIDE STORAGE:** Store in a cool, dry place away from food, drink and animal feeding stuffs. If spilled, do not flush to waterways (see Environmental Hazards). Carefully collect and containerize spilled material in a manner that produces the least amount of airborne dust. Suitable protective equipment should be worn during any spill cleanup operation (see Precautionary Statements). Residual surface material may be removed with towels moistened with methanol.

**PESTICIDE DISPOSAL:** **Pesticide wastes are acutely hazardous.** Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

**CONTAINER DISPOSAL:**

Container Disposal – **Liner:** Nonrefillable container. Do not reuse or refill this container. Completely empty liner into application equipment by shaking and tapping sides and bottom to loosen clinging particles. When completely empty offer for recycling if available or dispose of liner in a sanitary landfill.

Container Disposal – **Outer Drum:** Nonrefillable container. Do not reuse or refill this container. When completely empty offer for recycling if available or dispose of drum in a sanitary landfill.

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## CONDITION OF SALE AND LIMITATION OF WARRANTY AND LIABILITY

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**NOTICE:** Read the entire Directions for Use and Conditions of Sale and Limitation of Warranty and Liability before buying or using this product. If the terms are not acceptable, return the product at once, unopened, and the purchase price will be refunded.

The Directions for Use of this product must be followed carefully. It is impossible to eliminate all risks inherently associated with the use of this product. Ineffectiveness or other unintended consequences may result because of such factors as manner of use or application, weather, presence of other materials or other influencing factors in the use of the product, which are beyond the control of Tide International USA, Inc. or Seller. All such risks shall be assumed by Buyer and User, and Buyer and User agree to hold Tide International USA, Inc. and Seller harmless for any claims relating to such factors.

Tide International USA, Inc. warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated in the Directions for Use, subject to the inherent risks referred to above, when used in accordance with directions under normal use conditions. This warranty does not extend to the use of this product contrary to label instructions, or under abnormal conditions or under conditions not reasonably foreseeable to or beyond the control of Seller or Tide International USA, Inc., and Buyer and User assume the risk of any such use. **TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, TIDE INTERNATIONAL USA, INC. MAKES NO WARRANTIES OF MERCHANTABILITY OR OF FITNESS FOR A PARTICULAR PURPOSE NOR ANY OTHER EXPRESS OR IMPLIED WARRANTY EXCEPT AS STATED ABOVE.**

To the extent consistent with applicable law, neither Tide International USA, Inc. or Seller shall be liable for any incidental, consequential or special damages resulting from the use or handling of this product. **TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, THE EXCLUSIVE REMEDY OF THE USER OR BUYER, AND THE EXCLUSIVE LIABILITY OF TIDE INTERNATIONAL USA, INC. AND SELLER FOR ANY AND ALL CLAIMS, LOSSES, INJURIES OR DAMAGES (INCLUDING CLAIMS BASED ON BREACH OF WARRANTY, CONTRACT, NEGLIGENCE, TORT,**

**STRICT LIABILITY OR OTHERWISE) RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT, SHALL BE THE RETURN OF THE PURCHASE PRICE OF THE PRODUCT OR, AT THE ELECTION OF TIDE INTERNATIONAL USA, INC. OR SELLER, THE REPLACEMENT OF THE PRODUCT.**

Tide International USA, Inc. and Seller offer this product, and Buyer and User accept it, subject to the foregoing Conditions of Sale and Limitation of Warranty and Liability, which may not be modified except by written agreement signed by a duly authorized representative of Tide International USA, Inc.

EPA Code No.: TIC-INS8422916

EPA 20101105

Created date: 06/15/2012



## TIDE INTERNATIONAL USA INC.

21 HUBBLE, IRVINE, CA 92618, USA • Tel: 1-949-679-3535 • Fax: 1-949-679-3538

August 4, 2008

To Whom It May Concern:

RE: Letter of Authorization

Dear Sir or Madam:

Please let this letter serve to confirm that Pyxis Regulatory Consulting, Inc. is authorized to act as agents for Tide International USA, Inc. (EPA Company Number 84229), before the U.S. Environmental Protection Agency and state governmental agencies in all matters regarding our pesticide registrations pursuant to the Federal Insecticide, Fungicide and Rodenticide Act ("FIFRA"), 7 U.S.C. § 136 et seq. and state law.

If you have any questions, please do not hesitate to contact me.

Sincerely,



Der-I Wang, Ph D  
Vice President

cc: Pyxis Regulatory Consulting, Inc.

# Material Sent for Data Extraction

Reg. # 84229-16

Description: \_\_\_\_\_

☐ Material(s) Sent to Data Extraction Contractors:

☒ New Stamped Label Dated 8/14/12

☐ Notification Dated \_\_\_\_\_

☐ New CSF(s) Dated \_\_\_\_\_

☐ Other: \_\_\_\_\_

☐ Decision #: \_\_\_\_\_

☐ Other Action/Comments: \_\_\_\_\_

File this coversheet and attached materials in the jacket. It must be well organized and clipped together, NOT STAPLED. Then give the jacket with the coversheet and materials to staff in the Information Services Center (ISC) (Room S-4900). If a jacket is full or only available as an image, please file materials in a new jacket and bring it down to the (ISC). For further information please call 703-605-0716.

Reviewer: Autumn Metzger

Phone: 305-5314 Division: RD - IRB

Date: 8/14/12



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460



AUG 14 2012

OFFICE OF CHEMICAL SAFETY  
AND POLLUTION PREVENTION

Tide International USA, Inc.  
c/o Pyxis Regulatory Consulting, Inc.  
21 Hubble  
Irvine, CA 92618

Subject: **Amendment** to add the following new me-too uses: trees, shrubs, evergreens, flowers, foliage plants, groundcovers, Christmas trees, poplar/cottonwood trees, interior plantscapes, indoor non-food use, artichoke (globe), banana & plantain, bulb vegetables crop group, caneberry, coffee, cucurbit crop group, herb crop subgroup 19A, peanuts, pomegranate, soybean, and tree nut crop group (excluding almonds)  
Tide Technical Imidacloprid  
EPA Reg. No. 84229-16  
Your Submission Dated May 24, 2012

Dear Mr. Kellogg:

The labeling referred to above submitted in connection with the Federal Insecticide, Fungicide and Rodenticide Act, as amended is acceptable.

A stamped copy of the label is enclosed for your records. Please submit one final printed copy of the labeling before releasing the product for shipment. If you have any questions regarding this label, please contact Autumn Metzger at (703) 305-5314 or [metzger.autumn@epa.gov](mailto:metzger.autumn@epa.gov).

Sincerely,

A handwritten signature in blue ink that reads "Venus Eagle".

Venus Eagle  
Product Manager 01  
Insecticide-Rodenticide Branch  
Registration Division (7505P)

# Tide Technical Imidacloprid

FOR MANUFACTURING USE ONLY

**ACTIVE INGREDIENT:**

Imidacloprid,  
1-[(6-chloro-3-pyridinyl)methyl]-N-nitro-2-imidazolidinimine ..... 99.0%

**OTHER INGREDIENTS:** ..... 1.0%

**TOTAL:** ..... 100.0%

## KEEP OUT OF REACH OF CHILDREN CAUTION

FIRST AID	
If swallowed:	<ul style="list-style-type: none"><li>• Call a poison control center or doctor immediately for treatment advice.</li><li>• Have person sip a glass of water if able to swallow.</li><li>• Do not induce vomiting unless told to do so by the poison control center or doctor.</li><li>• Do not give anything by mouth to an unconscious person.</li></ul>
<b>NOTE TO PHYSICIAN</b>	
No specific antidote is available. Treat symptomatically.	
<b>HOT LINE NUMBER</b>	
Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact CHEMTREC at 1-800-424-9300 for emergency medical treatment information.	

EPA Reg. No. 84229-16  
EPA Est. No.

**Manufactured for:**  
Tide International USA, Inc.  
21 Hubble  
Irvine, CA 92618

Net Weight: Lbs.

ACCEPTED  
AUG 14 2012  
Under the Federal Insecticide, Fungicide,  
and Rodenticide Act, as amended, for the  
pesticide registered under:

EPA. Reg. No.: 84229-16

**PRECAUTIONARY STATEMENTS**  
**HAZARDS TO HUMANS AND DOMESTIC ANIMALS**  
**CAUTION**

Harmful if swallowed. Wash thoroughly with soap and water after handling and before eating, drinking, or using tobacco. Wear long-sleeved shirt and long pants, socks, shoes and chemical resistant gloves made of any waterproof material such as barrier laminate, butyl rubber, nitrile rubber, neoprene rubber, natural rubber, polyethylene, polyvinylchloride (PVC) or viton.

**ENVIRONMENTAL HAZARDS**

This product is highly toxic to aquatic invertebrates. Keep out of lakes, streams, or ponds. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans, or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the EPA.

**DIRECTIONS FOR USE**

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**Instructions to Formulators:** This technical product may be used to manufacture insecticide end-use products for:

- 1) Terrestrial Non-Food Crop, Residential, and Commercial Outdoor (including Greenhouses): lawn, turf and ornamentals (trees, shrubs, evergreens, flowers, foliage plants, groundcovers) in and around residential or commercial buildings; Christmas trees; Poplar/Cottonwood trees.
- 2) Residential and Commercial Indoor Non-Food: Greenhouse ornamentals; interior plantscapes.
- 3) Terrestrial Non-food Crop Use, Domestic Indoor & Outdoor Use: companion animals.
- 4) Indoor Non-food Use: Tide Technical Imidacloprid can be formulated into end-use aqueous and solvent system products for pressure treatment of wood products [millwork (window frames, wood doors, doorframes, etc.), in-ground contact uses (wood products – pilings, telephone poles, wood building materials, etc.); sapstain control (fresh-cut lumber)] to protect against termites.
- 5) Terrestrial Food Crops:

Artichoke (Globe)  
Banana & Plantain  
Bushberry Crop Subgroup  
*Brassica* (Cole) Crop Group  
Bulb Vegetables Crop Group  
Caneberry  
Canola  
Cereal Grain Crop Group (barley, oat, rye, sorghum, wheat), excluding rice  
Citrus Crop Group (containerized and field)  
Coffee  
  
Cotton  
Cranberry

Herb Crop Subgroup 19A  
Hops  
Leafy Petiole Vegetables Crop Subgroup  
Leafy Vegetables Crop Subgroup  
Legume Vegetables Crop Group, except soybean  
Peanuts  
Pome Fruit Crop Group  
Pomegranate  
  
Potato (including seed piece treatment)  
Root and Tuber Vegetables Crop Subgroup, except sugar beet  
Soybean  
Strawberry



Cucurbit Crop Group  
Fruiting Vegetable Crop Group  
Grapes  
Greenhouse Vegetables (tomato, cucumber)

Stone Fruit Crop Group  
Sugar Beet  
Tobacco  
Tree Nut Crop Group, excluding Almonds  
Tropical Fruit (Acerola, Atemoya, Avocado, Black sapote, Canistel, Cherimoya, Custard apple, Feijoa, Jaboticaba, Guava, Llama, Longan, Lychee, Mamey sapote, Mango, Papaya, Passionfruit, Persimmon, Pulasan, Rambutan, Sapodilla, Soursop, Spanish lime, Star apple, Starfruit, Sugar apple, Wax jambu)

- 6) Uses for which U. S. EPA has accepted the required data and/or citation of data that the formulator has submitted in support of registration;
- 7) Uses for experimental purposes that are in compliance with U.S. EPA requirements

#### STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

**PESTICIDE STORAGE:** Store in a cool, dry place away from food, drink and animal feeding stuffs. If spilled, do not flush to waterways (see Environmental Hazards). Carefully collect and containerize spilled material in a manner that produces the least amount of airborne dust. Suitable protective equipment should be worn during any spill cleanup operation (see Precautionary Statements). Residual surface material may be removed with towels moistened with methanol.

**PESTICIDE DISPOSAL:** **Pesticide wastes are acutely hazardous.** Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

**CONTAINER DISPOSAL:**

Container Disposal – **Liner:** Nonrefillable container. Do not reuse or refill this container. Completely empty liner into application equipment by shaking and tapping sides and bottom to loosen clinging particles. When completely empty offer for recycling if available or dispose of liner in a sanitary landfill.

Container Disposal – **Outer Drum:** Nonrefillable container. Do not reuse or refill this container. When completely empty offer for recycling if available or dispose of box in a sanitary landfill.

#### CONDITION OF SALE AND LIMITATION OF WARRANTY AND LIABILITY

**NOTICE:** Read the entire Directions for Use and Conditions of Sale and Limitation of Warranty and Liability before buying or using this product. If the terms are not acceptable, return the product at once, unopened, and the purchase price will be refunded.

The Directions for Use of this product must be followed carefully. It is impossible to eliminate all risks inherently associated with the use of this product. Ineffectiveness or other unintended consequences may result because of such factors as manner of use or application, weather, presence of other materials or other influencing factors in the use of the product, which are beyond the control of Tide International USA, Inc. or Seller. All such risks shall be assumed by Buyer and User, and Buyer and User agree to hold Tide International USA, Inc. and Seller harmless for any claims relating to such factors.

Tide International USA, Inc. warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated in the Directions for Use, subject to the inherent risks referred to above, when used in accordance with directions under normal use conditions. This warranty does not extend to the use of this product contrary to label instructions, or under abnormal conditions or under conditions not reasonably foreseeable to or beyond the control of Seller or Tide International USA, Inc., and Buyer and User assume the risk of any such use. TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, TIDE INTERNATIONAL USA, INC.



MAKES NO WARRANTIES OF MERCHANTABILITY OR OF FITNESS FOR A PARTICULAR PURPOSE NOR ANY OTHER EXPRESS OR IMPLIED WARRANTY EXCEPT AS STATED ABOVE.

To the extent consistent with applicable law, neither Tide International USA, Inc. or Seller shall be liable for any incidental, consequential or special damages resulting from the use or handling of this product. **TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, THE EXCLUSIVE REMEDY OF THE USER OR BUYER, AND THE EXCLUSIVE LIABILITY OF TIDE INTERNATIONAL USA, INC. AND SELLER FOR ANY AND ALL CLAIMS, LOSSES, INJURIES OR DAMAGES (INCLUDING CLAIMS BASED ON BREACH OF WARRANTY, CONTRACT, NEGLIGENCE, TORT, STRICT LIABILITY OR OTHERWISE) RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT, SHALL BE THE RETURN OF THE PURCHASE PRICE OF THE PRODUCT OR, AT THE ELECTION OF TIDE INTERNATIONAL USA, INC. OR SELLER, THE REPLACEMENT OF THE PRODUCT.**

Tide International USA, Inc. and Seller offer this product, and Buyer and User accept it, subject to the foregoing Conditions of Sale and Limitation of Warranty and Liability, which may not be modified except by written agreement signed by a duly authorized representative of Tide International USA, Inc.

[EPA approval date]



RE: epa reg no. 84229-16 fast track label comments

Mike Kellogg

to:

Autumn Metzger

08/13/2012 12:10 PM

Hide Details

From: Mike Kellogg <Mike@PyxisRC.com>

To: Autumn Metzger/DC/USEPA/US@EPA

History: This message has been replied to.

1 Attachment



084229-00016.20120813v2.Tide Technical Imidacloprid label amendment.pdf

Autumn,

Attached please find a revised label for EPA Reg. No. 84229-16 incorporating your comments below with the following exception:

Net Weight/Net Contents – I left the Net Weight expression (did not change to “Net Contents”) as the Label Review Manual Chapter 17, p. 17-1 states for Dry Formulations the net weight must be expressed as pounds or ounces.

We’ve always expressed “Net Weight” for dry/solid formulations and “Net Contents” for liquid formulations.

If you disagree and want me to change to Net Contents, let me know.

Regards,

Mike Kellogg

Pyxis Regulatory Consulting, Inc.

Resubmission  
5921917

4110 136<sup>th</sup> St. NW  
Gig Harbor, WA 98332  
T: (253) 853-7369  
F: (253) 853-5516  
E: Mike@PyxisRC.com

**From:** Autumn Metzger [mailto:Metzger.Autumn@epamail.epa.gov]  
**Sent:** Sunday, August 12, 2012 7:07 PM  
**To:** Mike Kellogg  
**Subject:** epa reg no. 84229-16 fast track label comments

Hi Mike,

only a couple very minor comments for this one.

page 1, the "net weight" should be "net contents" and please fill in with at least the measurement units it will be sold in (need to know if liquid, solid, fl. oz, gallons etc.)  
pg 2, under #5 revise to read "Terrestrial Food Crops:" (delete including)  
please add page numbers in the format "1 of X"

that's it, as soon as you get it back to me we can get this one stamped. Let me know if you have any questions/concerns.


thanks,

Autumn Metzger  
Biologist  
U.S. Environmental Protection Agency  
Insecticide-Rodenticide Branch  
Registration Division (7505P)  
1200 Pennsylvania Ave. NW  
Washington, DC 20460

Tel: 703 305-5314  
Fax: 703 308-5433  
Email: [metzger.autumn@epa.gov](mailto:metzger.autumn@epa.gov)

# FAST-TRACK AMENDMENTS – Completeness Screening Checklist

Expert's In-Processing Signature: Atkinson Date: 6/4/12 PM #: 1

EPA Reg. Number: <u>84229-16</u>		EPA Receipt Date: <u>5/25/12</u>		
	Checklist Item	Yes	No	N/A
1	<b>Application Form</b> (EPA Form 8570-1) - signed?	✓		
2	<b>Confidential Statement of Formula</b> (EPA Form 8570-29) - signed?			✓
3	<b>Certification with Respect to Citation of Data</b> (EPA Form 8570-34) - signed?			✓
4	<b>Formulator's Exemption Statement</b> (EPA Form 8570-27) - signed?	✓		
5	<b>Data Matrix</b> (EPA Form 8570-35) [Applicable for adding me-too uses] - signed?			✓
	a) Selective Method?			
	b) Cite-All Method?			
	c) Public copy of Matrix provided? See PR Notice 98-5			
6	<b>Is Label included?</b> (5 copies)	✓		
	a) Electronic Label submitted?	✓		
<b>Comments:</b>  				



**Receipt for Section 3**

S: 917571 Resubmission: ☐ Yes ☒ No

Regulatory Type: Product Registration - Section 3 Fee For Service: ☐ Yes ☒ No

Application Type: Amendment Billable: ☐ Yes ☒ No

Company: 84229 TIDE INTERNATIONAL, USA, INC. ☒

Risk Manager: Registration Division, Risk Management Team 1

Product #: 84229-16 Product Name: TIDE TECHNICAL IMIDACLOPRID

Override#:

Me Too Section3:  Me Too Product Name:

Application Date: 24-May-2012 ☒ OPP Rec'd Date: 25-May-2012 ☒

Front End Date: 29-May-2012 ☒ Risk Manager Send Date: 29-May-2012 ☒

FFS Due Date:  Negotiated Due Date:

OPP Target Date:

Fast Track: ☐ New Ingredient: ☐

Receipt Description: Label amendment to add me-too uses

Form A: ☐ Signature Date:  Form B: ☐ Signature Date:

New Ingredient Request Date:

New Ingredient Received Date:

View/Edit

Receipt Content

Receipt Content	Des
Paper Label	
Electronic Label	

Print Letter

Enter More Information

Tracking

\*Product ingredient source information may be entitled to confidential treatment\*



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

May 31, 2012

OFFICE OF  
PREVENTION, PESTICIDES AND  
TOXIC SUBSTANCES

JANELLE KAY  
TIDE INTERNATIONAL, USA, INC.  
C/O PYXIS REGULATORY CONSULTING, INC  
4110 136TH ST. NW  
GIG HARBOR, WA 98332-

PRODUCT NAME: TIDE TECHNICAL IMIDACLOPRID  
COMPANY NAME: TIDE INTERNATIONAL, USA, INC.  
OPP IDENTIFICATION NUMBER:  
EPA FILE SYMBOL: 84229-16  
EPA RECEIPT DATE: 05/25/12

SUBJECT: RECEIPT OF AMENDMENT

DEAR REGISTRANT:

The Office of Pesticide Programs has received your application for an amendment and it has passed an administrative screen for completeness.

During the initial screen we determined that the application appears to qualify for fast track review. The package will now be forwarded to the Product Manager for review to determine its acceptability for fast track status.

If you have any questions, please contact Registration Division, Risk Management Team 1, at (703) 308-8045.

Sincerely,

Front End Processing Staff  
Information Services Branch  
Information Technology & Resources Management Division

## Fee for Service

{91571Ä~

This package includes the following

- ☐ New Registration
- ☒ Amendment

☐ Studies? ☐ Fee Waiver?

☐ volpay % Reduction: \_\_\_\_

for Division

- ☐ AD
- ☐ BPPD
- ☐ RD

Risk Mgr. 1

Receipt No.

S-

91571

EPA File Symbol/Reg. No.

84229-16

Pin-Punch Date:

5/25/2012

☒ This item is NOT subject to FFS action.

### Action Code:

Requested:

Granted:

Amount Due: \$ \_\_\_\_

### Parent/Child Decisions:

☒ Inert Cleared for Intended Use

☐

Uncleared Inert in Product

Reviewer: 

Date: 5-25-12

Remarks:

MAY 29 2012



PYXIS REGULATORY CONSULTING, INC.

4110 136<sup>th</sup> St. NW  
Gig Harbor, WA 98332

Phone: 253-853-7369  
Fax: 253-853-5516  
www.PyxisRC.com

May 24, 2012

COURIER DELIVERY

Venus Eagle (PM 1)  
Document Processing Desk (AMEND)  
Office of Pesticide Programs (7504P)  
U.S. Environmental Protection Agency  
Room S-4900, One Potomac Yard  
2777 S. Crystal Drive  
Arlington, VA 22202-4501

RE: Tide International USA, Inc. – Tide Technical Imidacloprid (EPA Reg. No. 84229-16)  
Submission of Label Amendment to Add Me-Too Uses

Dear Ms. Eagle,

On behalf of Tide International USA, Inc. please find the enclosed application to amend the Tide Technical Imidacloprid label to add new uses. The use sites may be found on the following EPA registered label:

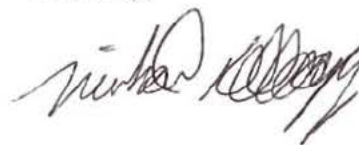


In support of this amendment application, we submit the following documents:

1. Application for Pesticide Registration (EPA Form 8570-1)
2. One (1) copy of the proposed label with changes tracked
3. Five (5) copies of the proposed labeling with changes incorporated
4. Certification With Respect to Label Integrity
5. One copy of the Tide Technical Imidacloprid proposed label on CD
6. Formulator's Exemption Statement (EPA Form 8570-27)
7. Letter of Authorization

Because no data are being submitted with this amendment, and no data will need to be reviewed to approve the proposed labeling, Tide International USA, Inc. believes this action qualifies as a Fast Track amendment and is not subject to a Pesticide Registration Service Fee. Please feel free to contact me ((253) 853-7369, Mike@PyxisRC.com) if you have any questions or need any additional information.

Sincerely,



Michael Kellogg

Enclosures

cc: D. Wang; Tide International USA, Inc.



Please read instructions on reverse before completing form.

Form Approved, OMB No. 2070-0060, Approval expires 2-28-95



United States  
Environmental Protection Agency  
Washington, DC 20460

☐ Registration  
☒ Amendment  
☐ Other

OPP Identifier Number

### Application for Pesticide - Section I

1. Company/Product Number 84229-16	2. EPA Product Manager V. Eagle	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Tide International USA, Inc. / Tide Technical Imidacloprid	PM# 1	
5. Name and Address of Applicant (Include ZIP Code) Tide International USA, Inc. c/o Pyxis Regulatory Consulting, Inc. 4110 136th St. NW Gig Harbor, WA 98332 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. [REDACTED] Product Name [REDACTED]	

### Section - II

<input checked="" type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

**Explanation:** Use additional page(s) if necessary. (For section I and Section II.)

Submission of label amendment to add me-too uses. Because no data are being submitted with this amendment, and no data will need to be reviewed to approve the proposed labeling, Tide International USA, Inc. believes this action qualifies as a Fast Track amendment and is not subject to a Pesticide Registration Service Fee. Please feel free to contact me ((253) 853-7369, Mike@PyxisRC.com) if you have any questions or need any additional information.

### Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		<input type="checkbox"/> Metal	
* Certification must be submitted				<input type="checkbox"/> Plastic	
				<input type="checkbox"/> Glass	
				<input type="checkbox"/> Paper	
				<input checked="" type="checkbox"/> Other (Specify) lined fiber drum	
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container 2.2 kg (5 lb), 20 kg (44 lb), 25 kg (55)		5. Location of Label Directions <input checked="" type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product	
6. Manner in Which Label is Affixed to Product <input checked="" type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled			<input type="checkbox"/> Other _____		

### Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)					
Name Michael Kellogg		Title Agent		Telephone No. (Include Area Code) (253) 853-7369	
<b>Certification</b> I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.					6. Date Application Received (Stampd)
2. Signature 		3. Title Agent			
4. Typed Name Michael Kellogg		5. Date 5/24/12			



United States  
Environmental Protection Agency  
Washington, DC 20460  
**Formulator's Exemption Statement**  
(40 CFR 152.85)

Applicant's Name and Address  Tide International USA, Inc. 21 Hubble Irvine, CA 92618	EPA File Symbol/Registration Number 84229-16
	Product Name Tide Technical Imidacloprid
	Date of Confidential Statement of Formula (EPA Form 8570-4) 07/22/2010

As an authorized representative of the applicant for registration of the product identified above, I certify that:

(1) This product contains the following active ingredient(s):

Imidacloprid

(2) Of these, each active ingredient listed in paragraph (4) is present solely as the result of the use of that active ingredient in the manufacturing, formulation or repackaging another product which contains that active ingredient which is registered under FIFRA Section 3, is purchased by us from another person and meets the requirements of 40 CFR section 158.50(e)(2) or (3).

(3) Indicate by checking (A) or (B) below which paragraph applies:

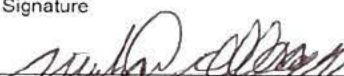
☐ (A) An accurate Confidential Statement of Formula (EPA FORM 8570-4) for the above identified product is attached to this statement. That formula statement indicates, by company name, registration number, and product name, the source of the active ingredient(s) listed in paragraph (1).

OR

☒ (B) The Confidential Statement of Formula (CSF)(EPA Form 8570-4) referenced above and on file with the EPA is complete, current, an accurate and contains the information required on the current CSF.

(4) The following active ingredients in this product qualify for the formulator's exemption.

**Source**

Active Ingredient	Product Name	Registration Number
Imidacloprid	[REDACTED]	[REDACTED]
Signature 	Name and Title Michael Kellogg / Agent	Date 5/24/12

EPA Form 8570-27 (Rev. 06-2004)

Copy 1 - EPA  
Copy 2 - Applicant copy



# Tide International (USA) Inc.

---

21 Hubble, Irvine, CA 92618, USA. Phone: 949-679-3535 Fax: 949-679-3538

December 28, 2009

To Whom It May Concern:

RE: Letter of Authorization

Dear Sir or Madam:

Please let this letter serve to confirm that Janelle Kay and Michael Kellogg of Pyxis Regulatory Consulting, Inc. are authorized to act as agent for Tide International USA, Inc. (EPA Company Number 84229), before the U.S. Environmental Protection Agency, California Department of Pesticide Regulation Pesticide Registration Branch and other state governmental agencies in all matters regarding our pesticide registrations pursuant to the Federal Insecticide, Fungicide and Rodenticide Act ("FIFRA"), 7 U.S.C. § 136 et seq. and state law.

If you have any questions, please do not hesitate to contact me.

Sincerely,

Der-I Wang, Ph.D.

Vice President

cc: Pyxis Regulatory Consulting, Inc.



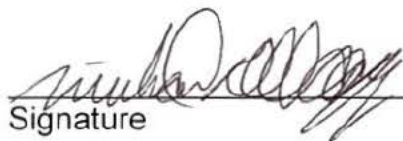
# Certification with Respect to Label Integrity

version: 9/11/02

I certify that the information (including, but not limited to, text, tables, and graphics) contained in the electronic file identified below by file name and submitted with this certification is the same information as that on the paper copies of these documents included with this submission.

PROPOSED LABEL		
EPA Registration #	Date Submitted to EPA	Electronic file name
84229-16	May 24, 2012	084229-00016.20120524.Tide Technical Imidacloprid label amendment.pdf

I certify that the statements that I have made on this form are true, accurate, and complete. I acknowledge that any knowingly false or misleading statements may be punishable by fine or imprisonment or both under applicable law.

  
Signature

5/24/12  
Date

Michael Kellogg

Name (typed)

Agent

Title



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460



OFFICE OF  
CHEMICAL SAFETY AND  
POLLUTION PREVENTION

April 25, 2012

Tide International USA, Inc.  
c/o Michael Kellogg  
Pyxis Regulatory Consulting, Inc.  
4110 136<sup>th</sup> Street NW  
Gig Harbor, WA 98332

Dear Mr. Kellogg:

Subject: Storage Stability and Corrosion Characteristics Data (Condition of Registration)  
Product Name: Tide Technical Imidacloprid  
EPA Reg. No. 84229-16

The study (MRID 48213001) cited to fulfill the conditional data requirement referred to above, in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, is acceptable. The condition of registration is considered fulfilled. Should you have any questions, please contact me at 703-308-8735 or [chao.julie@epa.gov](mailto:chao.julie@epa.gov).

Sincerely,

A handwritten signature in cursive script, appearing to read "Julie A. Chao".

Julie A. Chao  
Insecticide-Rodenticide Branch  
Registration Division (7505P)  
Office of Pesticide Programs

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460-0001



OFFICE OF CHEMICAL SAFETY  
AND POLLUTION PREVENTION

April 25, 2012

**MEMORANDUM:**

Subject: EPA Registration Number: 84229-16  
Product Name: Tide Technical Imidacloprid  
DP Barcode: 401227  
Decision Number: 463954  
PC Code: 129099

From: Julie Chao, Team Reviewer  
Insecticide-Rodenticide Branch  
Registration Division

*Julie Chao*  
4/25/12

To: Venus Eagle, Product Manager 1  
Insecticide-Rodenticide Branch  
Registration Division

Applicant: Tide International USA, Inc.  
c/o Pyxis Regulatory Consulting, Inc.  
4110 136<sup>th</sup> Street NW  
Gig Harbor, WA 98332

**FORMULATION FROM SUBJECT PRODUCT LABEL:**

	<u>% by weight</u>
<u>Active Ingredient:</u>	
Imidacloprid .....	99.0%
<u>Other Ingredients:</u> .....	1.0%
Total:	100.0%

## **BACKGROUND:**

In response to the conditions of registration specified in the Notice of Pesticide Registration dated November 5, 2010, the registrant has cited a study (MRID 48213001) which contains the results from a one year test of storage stability and corrosion (Guidelines 830.66317 and 830.6320). [REDACTED]

## **SUMMARY OF FINDINGS:**

The test material used in the study was [REDACTED]. To evaluate stability, the material was stored for a period of one year at 25°C nominal temperature in heat-sealed polyethylene-lined Kraft pouches to simulate storage in the commercial container. Samples were assayed at 3-month intervals for the duration of the study and analyzed by high performance liquid chromatography (HPLC) using UV/visible detection. The initial mean percentage of measured active ingredient was 97.21%. The mean percentage after one year of storage was 98.38%. The results, summarized in the table below, are within the certified limits specified on the product CSF.

**Table 1: % Imidacloprid at 3-Month Intervals**

Sampling Interval	% wt/wt Imidacloprid*
Initial	97.21
3 months	96.92
6 months	98.04
9 months	97.52
12 months	98.38

\* mean concentration

To evaluate corrosion, container weights were measured and physical evaluations of the test packages were performed at 3-month intervals for the duration of the study. There were no significant weight changes over the storage interval, nor were there any observed physical changes in the appearance of the packaging material or test material.

## **CONCLUSION:**

The results support the conclusion that the product is stable for at least one year in ambient storage conditions, and that the product is not corrosive to commercial packaging. This submission satisfies the data requirements specified under Guidelines 830.66317 and 830.6320, and MRID 48213001 has been classified as "Acceptable."

## DATA PACKAGE BEAN SHEET

Date: 24-Apr-2012

Page 1 of 2

Decision #: 463954

DP #: (401227)

NON PRIA

Parent DP #:

Submission #: 914317

E-Sub #:

### \*\*\* Registration Information \*\*\*

Registration: 84229-16 - TIDE TECHNICAL IMIDACLOPRID

Company: 84229 - TIDE INTERNATIONAL, USA, INC.

Risk Manager: RM 01 - Venus Eagle - (703) 308-8045 Room# PY1 S-7913

Risk Manager Reviewer: Julie Chao JCHAO

Sent Date:

Calculated Due Date: 17-Jul-2012

Edited Due Date:

Type of Registration: Product Registration - Section 3

Action Desc: (570) CONDITIONAL REGISTRATION FOLLOW-UP;DATA REQUIRED;REQUIRES RD REVII

Ingredients: 129099, Imidacloprid(99%)

### \*\*\* Data Package Information \*\*\*

Expedite: ☐ Yes ☒ No

Date Sent: 24-Apr-2012

Due Back:

DP Ingredient: 129099, Imidacloprid

DP Title: Storage Stability and Corrosion Characteristics

CSF Included: ☒ Yes ☐ No

Label Included: ☒ Yes ☐ No

Parent DP #:

#### Assigned To

#### Date In

#### Date Out

Organization: RD / IRB

24-Apr-2012

Last Possible Science Due Date: 08-May-2012

Team Name:

Science Due Date:

Reviewer Name: Chao, Julie

4/25/12

Sub Data Package Due Date:

Contractor Name:

### \*\*\* Studies Sent for Review \*\*\*

Printed on Page 2

### \*\*\* Additional Data Package for this Decision \*\*\*

No Additional Data Packages

### \*\*\* Data Package Instructions \*\*\*

Tide International has cited MRID 48213001 to fulfill the storage stability and corrosion characteristics conditions of registration.



DP#: (401227)

\*\*\* Studies Sent for Review \*\*\*

Decision#: (463954)

MRID	MRID Status	Citation Reference	Guideline	86-5 Status
48213001		Miller, R. (2010) Storage Stability and Corrosion Characteristics of Imidacloprid Tech: Final Report. Project Number: CHB/EX/657/014/P/1, CHB/EX/657. Unpublished study prepared by Analytical & Regulatory Chemistry, Inc. 38 p.	830.6317/Storage stability	Pass (06-Oct-2010)
48213001		Miller, R. (2010) Storage Stability and Corrosion Characteristics of Imidacloprid Tech: Final Report. Project Number: CHB/EX/657/014/P/1, CHB/EX/657. Unpublished study prepared by Analytical & Regulatory Chemistry, Inc. 38 p.	830.6320/Corrosion characteristics	Pass (06-Oct-2010)

**Receipt for Section 3**

S: 914317 Resubmission: ☐ Yes ☒ No

Regulatory Type: Product Registration - Section 3 Fee For Service: ☐ Yes ☒ No

Application Type: Amendment Billable: ☐ Yes ☒ No

Company: 84229 TIDE INTERNATIONAL, USA, INC. ☒ V

Risk Manager: Registration Division, Risk Management Team 1

Product #: 84229-16 Product Name: TIDE TECHNICAL IMIDACLOPRID

Override#:

Me Too Section3: Me Too Product Name:

Application Date: 27-Mar-2012 ☒ OPP Rec'd Date: 29-Mar-2012 ☒

Front End Date: 29-Mar-2012 ☒ Risk Manager Send Date: 30-Mar-2012 ☒

FFS Due Date: Negotiated Due Date:

OPP Target Date:

Fast Track: ☐ New Ingredient: ☐

Receipt Description: Label amendment

Form A: ☐ Signature Date: Form B: ☐ Signature Date:

New Ingredient Request Date: New Ingredient Received Date:

Print Letter  
Enter More Information  
Tracking

Receipt Content	Des
Paper Label	

View/Edit

\*Product ingredient source information may be entitled to confidential treatment\*

ss/cc - 570  
data bridging requested



UI

STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

AGENCY

April 4, 2012

OFFICE OF  
PREVENTION, PESTICIDES AND  
TOXIC SUBSTANCES

JANELLE KAY  
TIDE INTERNATIONAL, USA, INC.  
C/O PYXIS REGULATORY CONSULTING, INC  
4110 136TH ST. NW  
GIG HARBOR, WA 98332-

PRODUCT NAME: TIDE TECHNICAL IMIDACLOPRID  
COMPANY NAME: TIDE INTERNATIONAL, USA, INC.  
OPP IDENTIFICATION NUMBER:  
EPA FILE SYMBOL: 84229-16  
EPA RECEIPT DATE: 03/29/12

SUBJECT: RECEIPT OF AMENDMENT

DEAR REGISTRANT:

The Office of Pesticide Programs has received your application for an amendment and it has passed an administrative screen for completeness.

During the initial screen we determined that the application appears to qualify for fast track review. The package will now be forwarded to the Product Manager for review to determine its acceptability for fast track status.

If you have any questions, please contact Registration Division, Risk Management Team 1, at (703) 308-8045.

Sincerely,

A handwritten signature in blue ink, appearing to be "msc".

Front End Processing Staff  
Information Services Branch  
Information Technology & Resources Management Division

## Fee for Service

{914317&~

This package includes the following

- ☐ New Registration
- ☒ Amendment

- ☐ Studies?      ☐ Fee Waiver?
- ☐ volpay    % Reduction: \_\_\_\_

for Division

- ☐ AD
- ☐ BPPD
- ☒ RD

Risk Mgr. 1

Receipt No.

S-

914317

EPA File Symbol/Reg. No.

84229-16

Pin-Punch Date:

3/29/2012

☒ This item is NOT subject to FFS action.

Action Code:

Requested:

Granted:

Amount Due: \$ \_\_\_\_

Parent/Child Decisions:

☒ Inert Cleared for Intended Use

☐ Uncleared Inert in Product

Reviewer: *JPH*

Date: 3/30/12

Remarks:



Please read instructions on reverse before complete.

n.

Form Approved. C

2070-0060, Approval expires 2-28-95



United States  
Environmental Protection Agency  
Washington, DC 20460

☐ Registration  
☒ Amendment  
☐ Other

OPP Identifier Number

## Application for Pesticide - Section I

1. Company/Product Number 84229-16	2. EPA Product Manager V. Eagle	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Tide International USA, Inc. / Tide Technical Imidacloprid	PM# 1	
5. Name and Address of Applicant (Include ZIP Code) Tide International USA, Inc. c/o Pyxis Regulatory Consulting, Inc. 4110 136th St. NW Gig Harbor, WA 98332  <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. [REDACTED] Product Name [REDACTED]	

## Section - II

<input checked="" type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Request to bridge storage stability and corrosion characteristics data per the Agency letter dated November 5, 2010.

## Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		<input type="checkbox"/> Metal	
* Certification must be submitted				<input type="checkbox"/> Plastic	
	If "Yes" Unit Packaging wgt.	No. per container	If "Yes" Package wgt	<input type="checkbox"/> Glass	
				<input type="checkbox"/> Paper	
				<input checked="" type="checkbox"/> Other (Specify) lined fiber drum	
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container 2.2 kg (5 lb), 20 kg (44 lb), 25 kg (55)		5. Location of Label Directions <input checked="" type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product	
6. Manner in Which Label is Affixed to Product <input checked="" type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled			<input type="checkbox"/> Other _____		

## Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)			
Name Michael Kellogg		Title Agent	
		Telephone No. (Include Area Code) (253) 853-7369	
<b>Certification</b> I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.			6. Date Application Received (Stamped)
2. Signature 		3. Title Agent	
4. Typed Name Michael Kellogg		5. Date 3/27/12	

PYXIS REGULATORY CONSULTING, INC.

4110 136<sup>th</sup> St. NW  
Gig Harbor, WA 98332

Phone: 253-853-7369  
Fax: 253-853-5516  
www.PyxisRC.com

March 27, 2012

COURIER DELIVERY

**\*Product ingredient source information may be entitled to confidential treatment\***

Venus Eagle (PM 1)  
Document Processing Desk (AMEND)  
Office of Pesticide Programs (7504P)  
U.S. Environmental Protection Agency  
Room S-4900, One Potomac Yard  
2777 S. Crystal Drive  
Arlington, VA 22202

RE: Tide International USA, Inc. – Tide Technical Imidacloprid (EPA Reg. No. 84229-16)  
Request to Bridge Storage Stability and Corrosion Characteristic data

Dear Ms. Eagle,

On behalf of Tide International USA, Inc. (Tide) we are requesting that storage stability and corrosion characteristic data submitted to support [REDACTED] with submission application dated September 1, 2010 be used to support this registration, Tide Technical Imidacloprid (EPA Reg. No. 84229-16).

Tide Technical Imidacloprid and [REDACTED] are identical in formulation as Tide Technical Imidacloprid is a 100% repack of [REDACTED]

Applicable study information is provided below:

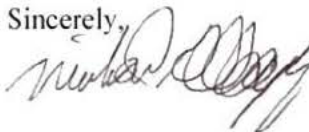
Volume 1	830.6317; 830.6320	Miller, R.L. Storage Stability and Corrosion Characteristics of Imidacloprid Tech.
	<b>MRID 48213001</b>	

In support of this request, please find the enclosed:

1. Completed Application for Registration (EPA Form 8570-1)

Please feel free to contact me by phone (253) 853-7369 or by email at Mike@PyxisRC.com if you have any questions or need any additional information.

Sincerely,



Michael Kellogg

Enclosures

cc: D. Wang; Tide International USA, Inc.

## Material to be added to an e-Jacket/Jacket

Reg. No. 84229-16

Decision # 437723

Description:

New registration

1. Placement within the e-Jacket/jacket:

- ☐ Default: (chronological, top = newest)  
☐ File Location: (eg. "before page 45 in .pdf")

\_\_\_\_\_

2. ☒ Send to Data Extraction contractors this material:

- ☒ Newly stamped accepted label  
☐ Notification  
☒ New CSF  
☐ Other: \_\_\_\_\_

3. Attach this coversheet to the top of the material or jacket. It must be well organized and clipped together, NOT STAPLED. Then give the material with this coversheet to staff in the Information Services Center (Room S-4900).

Reviewer: KC Bo + J

Phone: 306-0415

Division: RD

Date: 11-5-10

